Comments on CVRPC's 2026 Regional Plan

Staff have been working to integrate comments from the public, the Land Use Review Board, partner agencies, and commissioners. Pages 1-6 include all public comments which were incoporated into the Plan. The following pages detail the comments where no immediate action was taken but instead will serve as the starting point for the full rewrite of the plan that CVRPC intends to start in 2027.

Who	Integrated Comments	Response
Paula Emery	NECI is gone.	Reference removed
Paula Emery	Since substantial regional impact is a recurring and important matter, could there be a pull-out box for definition?	SRI is now defined in Appendix E
Paula Emery	FairPoint has been gone for a LONG time. Consolidated Communications has been purchased by Fidium – there's a transition happening now.	Section was updated to reflect new ownership
Paula Emery	6A – The ARCC is up on Granger Road now – is that permanent?	The Solid Waste section was updated to reflect more recent efforts by CVSWMD
Paula Emery	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.	Outdoor Recreation section was expanded on and Cross VT Trail was referenced.
John Brabant	Nevertheless, this protective language which honors our member municipalities' rights to fully direct development within their borders is absent from the draft that is now open for public comment and for amendments responsive to comments received. As such, I have drafted language consistent with what was discussed and agreed upon months ago for addition to the draft plan. As per the earlier request of the Regional Plan Committee members, please add the italicized language below to the pending draft of the CVRPC Regional plan before the close of the public comment period	Draft text, with some edits, was added to the Compatibility Statement.
Thomas Weiss	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. 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.	Text was updated.
Thomas Weiss	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.	Map 30: Recreation Sites was added.
Thomas Weiss	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.	Staff will revisit the checklist to provide further alignment between the goal and the element. However, there are some differences between the two that result in different responses to demonstrate conformance.
Thomas Weiss	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. 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.	Regional Plan Committee meetings were public meetings open to the public throughout the drafting period. Following the Pre-Application submission, CVRPC held 11 Q&A sessions to answer questions and provide additional avenues for community engagement. Paper copies of the Plan and Map were distributed to all municipalities and libraries.
Thomas Weiss	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;	All of the maps have been updated to include missing elements.
Thomas Weiss	Comment 25.B (D) The draft plan does not mention rare or irreplaceable natural areas.	An additional map was added depicting RINAs. Some text was added to show how RINAs overlap with resource protection areas and Critical Resource Areas identified in the text.

Who	Integrated Comments	Response
Thomas Weiss	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.	These areas are depicted as Enterprise on the FLU Map.
Thomas Weiss	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.	This updated table will live on the CVRPC website, allowing it to be a living document that can account for the fluctuations and changes in municipal plans that would not be captured if listed in the plan itself (currently ~6 municipal plans that are being updated which have significantly different energy chapters than what is in their existing town plan).
Thomas Weiss	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."	Additional text was added to Strategy e to address this comment.
Thomas Weiss	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.	Amtrak is briefly referenced in the text and the stops are mapped on Map 20: Airports and Railroads. Additional narrative on Amtrak and passenger rail in the region will be considered for the next plan.
Thomas Weiss	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.	This transportation asset is now mapped.
Thomas Weiss	Comment 27.F. There appears to be no discussion on costs and methods of financing transportation needs. Nor is there discussion on priorities.	A list of priority transportation projects was added to the Transportation chapter. Table 27 discusses financing options for municipalities.
Thomas Weiss	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. 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.	All maps previously in Appendix A have been updated to include all statutorily required elements.
Thomas Weiss	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.	Table added.

Who	Integrated Comments	Response
Thomas Weiss	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.	This table has now been included in Appendix C.
Thomas Weiss	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.	Updated mapping and FLUA areas calculations has been conducted.
Thomas Weiss	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 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.	Six communities have opted into Tier 1B. Those resolutions will be a part of the final application.
Karen Horn	Page 36 addresses the topic of eligibility for the National Flood Insurance Program. If all towns and cities in CVRPC are NFIP eligible, the regional plan needs to note that.	Text was updated.
Karen Horn	General Land Use Goal 2. Policy 3 "… however towers should use stealth technology" Please no fake trees.	Policy was updated to clarify what stealth technology refers to.
Karen Horn	Page 129 strategy b) add to list "encourage and incentivize community shared energy infrastructure such as geothermal"	Goal 2 strategy d was updated to include this language.
Karen Horn	Page 132 Goal 4 Strategies. The regional plan calls for working with utilities and municipalities to inventory and map infrastructure such as fiber optic cable to identify gaps. My understanding is that these inventories and maps exist today with the communications union districts including CV Fiber (KH)	Removed "such as fiber optic cable"
Thomas Weiss	Comment C17.B Because the sentence is about Act 250 proceedings, it seems that the order should be reversed. The District Environmental Commission makes the decision in all Act 250 proceedings. The Environmental Division only makes the decision in the rare case of an appeal of a decision made by a District Environmental Commission. Please amend the sentence.	Sentence was amended.
Thomas Weiss	Comment C23.A The link to the Public Environmental Data Partners is essentially useless. The link goes to https://screening-tools.com/. That's a home page which has no indication of how to find the documents linked in the footnotes. Please provide a link that goes directly to the appropriate document or to a screen on which the document is listed by name with a link to that document.	Link was updated.
Thomas Weiss	Comment C32.A It seems that mentioning the work begun by the Montpelier Commission on Flood Recovery on the Winooski River is appropriate here. Please revise the paragraph.	Reference to the Montpelier Commission on Flood Recovery was added.
Thomas Weiss	Comment C180.A. The correct jargon term under chapter 1 of the Environmental Protection Rules is "Clean Slate" systems. It is not "grandfathered". Please correct the term.	Term was corrected.
Thomas Weiss	Comment C181.A. The second sentence after the table is confusing. A more accurate statement would be "It should not be inferred, however, that operating at less than hydraulic capacity represents available capacity." Please change the sentence.	Sentence was amended.
Thomas Weiss	Comment C185.A This is confusing as written. It might help those not used to the jargon, if the second sentence were written along the lines of: "Fire districts in Vermont are independent , self-governing municipalities with limited jurisdiction, established by acts of their respective Towns or Cities under the authority of State law." Please amend the sentence.	Sentence was amended.

Who	Integrated Comments	Response
Thomas Weiss	Comment C191.A The Salvation Army has long operated in Barre. It closed as a result of the 2023 flood and now has moved to the Barre-Montpelier Road in Berlin. The Restore at Recycle North left Barre sometime after 2012. By 2015 the Resource began a similar re-use operation in the same building. ReStore returned to the area in 2026 by opening a facility in what I still call the Vermont Shopping Center on the Barre Montpelier Road. Please correct the Re-use paragraph.	The Solid Waste section was updated to reflect more recent efforts by CVSWMD.
Thomas Weiss	Comment C191.B The Central Vermont Solid waste Management District has long held household hazardous waste collections in the district. The District held perhaps five each year in different towns in the district. Household and business hazardous collection has been consolidated with other functions of the District in its EcoDepot which opened in Berlin in 2026. Please revise the paragraph to incorporate this information.	The Solid Waste section was updated to reflect more recent efforts by CVSWMD.
Thomas Weiss	Comment C215.A Vermont College no longer exists. After several sales and changes of name it is now Greenway Institute. And the T. W. Wood Art Gallery has moved out of its former location at the college into a building on Barre Street in Montpelier. Please correct this information.	Text was updated.
Thomas Weiss	Comment C300.A The table of the environmental benefits and burdens analysis has no information in the three columns needed to complete the analysis: "Regional Level"; EJ Focus Population Level"; and Disproportionate Benefit / Burden". Please complete the table in the draft plan and publicize its availability before the September 8 meeting, so the public has the ability to make meaningful comments on or before the hearing on September 14, I believe it is. If the table is not available before the September 8 hearing, then I believe your proper course of action is to delay the September 14 meeting until one week after the completed table is made available to the public.	The completed analysis was made available on 9/4/2026.
Thomas Weiss	Comment WD20.B. - I consider Vermont routes 12 and 14 to play an integral part in connecting Central Vermont to our neighboring regions. I would add those two routes to the paragraph on transportation.- Also, Routes 2 and 302 are U.S. routes.. I suggest changing the opening sentence to something like "Interstate 89, as well as other significant routes, including U. S. Routes 2 and 302 and Vermont Routes 12, 14, and 100, play an integral part . . . ". You could add other state routes in the region: 17, 25, 215, 232 to the list.	Sentence was amended.
Thomas Weiss	Comment WD21.A The last red paragraph. State agencies do not "base" their land use regulation on proposed developments' conformance to regional plans and municipal plans. Rather, State agencies have their own requirements to follow, specific to an agency's permit. A development's conformance to regional and municipal plan plays only a minor role in the agency's regulation. This minor role for regional and municipal plans is true even when the development is under the jurisdiction of either Act 250 or Section 248. The sentence might read something like "State agencies consider a proposed development's conformance to regional plans and municipal plans when involved with Act 250, Section 248, and other land use regulation.	Sentence was amended.
Thomas Weiss	Comment WD58.A. Goal 3, policy 6. WHPA was changed to SPA earlier in the draft.	Corrected.
Thomas Weiss	Comment WD65A. Apologies for not catching this earlier. The descriptions of the categories need to quote the definitions in 24 V.S.A. 4348 (a)(12). For example, the centers do not have to be vibrant, it is not in statute. The boundaries of the planned growth areas are defined by 4348a(a)(12)(B)(ii), (iii), (iv), and (vii). The boundaries are not determined primarily as stated in the paragraph. The text needs to refer to these requirements. I can make similar comments about the other land use categories.	The definitions provided for the FLUAs were updated to directly reflect the definitions provided within 24 V.S.A. § 4348a. The corresponding appendix which previously included statutory definitions was removed.
Thomas Weiss	Comment WD67.A. Policy 3. The phrase "growth areas" is ambiguous. Does it mean the land use category "planned growth areas"? Or is it a short way of referring to "Higher Density Growth Areas"? Use of the phrase continues through page 69.	Text was updated to indicate that the policies refer to Higher Density Growth Areas (Downtown Centers, Village Centers, Planned Growth Areas and Village Areas.

Who	Integrated Comments	Response
Thomas Weiss	Comment WD77.B. State designation programs. I think the paragraph should be rewritten.- There should be a period after "Centers and Neighborhoods". Otherwise the sentence reads that "the five legacy designation types . . . are now determined through the Future Land Use Map", which I think is incorrect.- I think it is inaccurate to characterize Act 181 (2024) as consolidating the five chapter 76A designation types into two chapter 139 types. I find that Act 181 ends the five chapter 76A designation types and creates the two chapter 139 types. The chapter 76A designations are allowed, in some instances, to linger until 2034 when they will expire and go out of existence.- Being a chapter 76A village center or new town center is only one of the three requirements for directly entering step 2 as a chapter 139 Downtown or Village Center.- Being a chapter 76A downtown development district is only one of the ten requirements for directly entering step 3 as a chapter 139 Downtown or Village Center.	Text was reviewed and edited where needed.
Thomas Weiss	Comment WD152.B. Limited access highway map. I acknowledge that the map is titled "Limited Access Highway" and it does show State highways. Vermont Route 215 is not shown. Vermont Route 25 is not shown (or maybe it is shown and the 0.3 miles in Orange does not show at this scale).	Map was updated to depict Vermont Route 215. Vermont 25 is present but at the scale is not visible.
Thomas Weiss	Comment WD233.A. The colors used for the trails are indistinguishable from each other and from the major roads (even enlarged to 200% on a monitor).	Map was updated.
Thomas Weiss	Comment WD316.A. The table of land areas in the four high density land use categories by municipality has been removed from Appendix D. Instead of removing the table, I ask that the table be expanded to include all the land use categories	Appendix C now includes this table showing all of the FLUA acreages by municipalities.
Thomas Weiss	Comment WD319. Appendix D, Environmental Benefits and Burdens Analysis. Thank you for completing the information on environmental benefits and burdens.- It is not clear when something is disproportionate, if it is a burden or a benefit. Splitting the column into two would help.- What is basis for determining whether the difference is disproportionate vs. proportionate?- For example in Water Pollution, % of land acreage in impaired watersheds. The EJ Focus Population Level is 1/6 that of the Regional Level. It is listed as having no environmental benefit or burden. I would list that as a "Yes" because a ratio of 6 to 1 seems disproportionate. It seems to be a disproportionate benefit. So why is it Comments on Central Vermont Staff Working Draft Page 4 not disproportionate with such a large divergence.- NRPC and RRPC have some metrics that could be applied to those declared in Appendix D to be without metrics. Possibly other RPC's have metrics for others of those without metrics.- The data used in the analysis needs to be provided. For example, how was the number of recreational sites per 1,000 population determined?	The EJ analysis was refined to include more qualitative descriptions of the benefits and burdens mapped.
Thomas Weiss	However, I noticed that some required maps are missing. And that many of the required features were not shown and still are not shown. Rather than providing a detailed list now, I am asking that you review what is required by sec. 4348a and provide maps with the required features. And provide them in time for review and comment before the time for submitting comments in preparation of the second hearing.	All maps have been updated.
Stephen Whitaker	The future land use map is not before the Board in a fixed, reviewable form.	The FLU map was not altered on the LURB database since initial submission and the confirmation of completeness received on 7/8, was unchanged on CVRPC's interactive map viewer until the final draft was completed, and has now been added into the Plan itself.
Stephen Whitaker	There is no demonstrated provenance or archival control over the map.	See above. The FLU Map is preserved in the Plan itself and will be uploaded to the LURB's database for the final application.
Stephen Whitaker	The participation and education duties are not satisfied on this record	While staff have carried out extensive outreach throughout the planning process, additional Q&A sessions, distribution of paper copies of the Plan and Map, and other forms of outreach have been carried out since the Plan was first submitted for Pre-Application to the LURB.

Who	Integrated Comments	Response
Stephen Whitaker	This is a further instance of the access gap described in Part 21. The copies of the draft Plan and map deposited at the Kellogg-Hubbard Library in Montpelier include individual map excerpts for only six of this region's twenty-three municipalities — Berlin, Calais, East Montpelier, Middlesex, Worcester, and Montpelier. Residents of any of the other seventeen towns visiting that library have no way to view their own town's map there, and no visitor to that library can view the region as a whole.	All libraries in the region were given the large maps for the towns that they serve, including Kellog-Hubbard Library. A large-scale regional map was available for public viewing at CVRPC's office in Montpelier.

Who	Flood Resilience Comments	Response
Paula Emery	Is this the only mention of worsening the hazard downstream? Because that's becoming a very big deal.	Elaboration on this topic will be considered during the next rewrite of the Plan.
Sandra Vitzthum	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. Here is my concern: As you know, something like 3% of Vermont is se led 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. I was glad that Chris an Meyer proposed an intermediate zone, "Resilience zone," but I fear that does not go far enough. I would like to suggest this approach for municipalities with flood hazard regulations and/or projects ge ng 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.	CVRPC originally used Rural Conservation to denote all flood hazard or river corridor areas across the region, including in areas with existing development, but excluding legacy designated villages and downtowns. The LURB stated that the areas mapped as Rural Conservation which overlap or bisect existing development do not meet the statutory definition for Rural Conservation. They also cautioned against a proposed Special Use - Resilience category for these areas. CVRPC, as an intermediate step, adjusted its mapping to classify these areas as Transition/Infill, Enterprise, or Rural General as appropriate. The treatment of flood hazard areas in FLU mapping will continue to be an ongoing discussion and will be revisted during the next plan rewrite.
Thomas Weiss	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	Data on total damages and the financial impacts are still being finalized for the July 2024 flood. If the data is available for the next plan, it will be included then.
Thomas Weiss	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.	Since building flood resilience ties into all of the other elements in the Plan, it was integrated as a theme rather than a stand alone chapter. For the next plan, CVRPC will work to provide a more cohesive flood resilience element.
Thomas Weiss	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.	These areas are now identified in Map 6: Watershed Boundaries and River Corridors and Map 9: Flood Hazard Areas. These maps work in conjunction with the goals and policies in the plan to encourage the protection of all these identified areas (e.g. Natural Resources and Working Lands Goal 1, Policy 5).
Stanley Wasson Community Alliance	Inclusion within a Downtown Center or other growth-area boundary does not constitute a finding that every parcel within that boundary is suitable for intensified development.	CVRPC balanced the municipalities priorities and requests, the statutory FLUA definitions, VAPDA methodology, and flood resilience priorities when creating the FLU map. While this parcel remained within the Downtown Center FLUA, how flood hazard areas and river corridors are classified during FLU mapping will continue into the next plan rewrite.
Stanley Wasson Community Alliance	Carry-forward of a legacy state designation does not eliminate CVRPC's independent obligation to consider current flood-hazard conditions and the mandatory flood-resilience requirements of 24 V.S.A. § 4348a.	See above.
Stanley Wasson Community Alliance	Vacant or substantially undeveloped land within an identified flood-hazard area should not be treated as "preexisting development suitable for infill" solely because buildings historically existed on the property.	See above.

Who	Flood Resilience Comments	Response
Stanley Wasson Community Alliance	Where flood-damaged buildings have been demolished and land subsequently restored to an open condition associated in State records with flood mitigation, that history should be considered together with present site conditions rather than treating the parcel as functionally unchanged from its previously developed state.	See above.
Stanley Wasson Community Alliance	Current FEMA flood-hazard information, municipal flood-hazard overlays, river-corridor information, documented or observed recent inundation, flood-storage and flow-path functions, safe access and egress, and adopted Local Hazard Mitigation Plans should inform Future Land Use classifications and any determination concerning Tier 1 eligibility.	See above.
Stanley Wasson Community Alliance	CVRPC should clearly distinguish between making existing developed centers more resilient and encouraging substantial new development on presently vacant or open flood-hazard and flood-storage land.	See above.
Stanley Wasson Community Alliance	Where an inherited Downtown Center boundary contains individual parcels whose present environmental conditions may conflict with regional flood-resilience policies, CVRPC should explain what mapping, policy, overlay, qualification, or other mechanism preserves that distinction.	See above.
Stanley Wasson Community Alliance	CVRPC should explain the mapping methodology resulting in existing residential properties immediately opposite Stanley-Wasson being classified Rural Conservation while the presently vacant and recently inundated Stanley-Wasson parcel remains within the Downtown Center.	See above.
Stanley Wasson Community Alliance	Where observed flood behavior indicates that a vacant or open parcel may perform flood-storage, backwater, conveyance, or other floodplain functions, those functions should be evaluated before the parcel is identified for intensified future development.	See above.

Who	Natural Resources Comments	Response
Mike Miller	Pg 42 defines steep slopes at between 15 to 25%. I think it should be slopes above 15% are steep slopes considering we have slopes in excess of 25% too.	This change will be considered in the next rewrite of the full plan.
Thomas Weiss	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).	The Act 250 criteria are discussed throughout the Plan, for example the Resource Protection section in the Natural Resources and Working Lands and the accompanying goals and policies. In the next rewrite, more clarity around the Act 250 criteria, and the intersection between Act 250 permitting and regional plans will be considered.
Karen Horn	Re wildlife habitat should mention the reality of increasing populations of deer, bear, and migrating animals due to warming climate.	This change will be considered in the next rewrite of the full plan.
Karen Horn	Natural Resources goals should establish that any regional stormwater management districts should be based on watersheds instead of any less relevant boundary. Stormwater management is vital to protecting existing development and to providing opportunities for future development, such as housing, in places planned for growth.	This change will be considered in the next rewrite of the full plan.
Joshua Schwartz	Pg. 43, Watersheds section: "Towns have partnered with a variety of organizations to restore riparian habitat and implement town wide water quality projects, including Friends of the Winooski, Friends of the Mad River, Mad River Watershed Conservation Partnership, Vermont River Conservancy, the Winooski Natural Resource Conservation District, and the Montpelier Commission for Recovery and Resilience." The Mad River Watershed Conservation Partnership ceased operations in 2019. It might make sense to keep this reference, as the sentence is in the past tense and, as such, accurate. However, I thought it would be useful to bring to your attention.	This change will be implemented during the next rewrite of the Plan.

Who	Working Lands Comments	Response
Mike Miller	Pg 56 Woodbury has active quarries too (also owned by Rock of Ages).	While one of the larger quarries in Woodbury was mentioned, a more detailed discussion of active quarries in the region can be included.
Thomas Weiss	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	While food production is addressed, clarity and additional goals/policies around food production and fibers can be added to further this goal.
Thomas Weiss	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.	A new map showing resource extraction operations will be considered in the next rewrite.
Karen Horn	Natural Resources and Working Lands Trends. The bullet list should note that longtime farmers are hanging on by their fingernails and also that new farms are starting up with some non-traditional agricultural enterprises.	Discussion on the challenges facing the viability of farms and agricultural businesses will be considered during the next rewrite of the plan.
Karen Horn	"As such it is a primary goal of this regional plan to preserve and promote a viable agricultural economy, culture, and land base." The matter of preserving agricultural soils to the exclusion of other uses that landowners and farmers may find necessary to keep farming (devoting a portion of land to septic, housing, or solar to name a few) is complicated and is a reason that Act 187 was signficantly revised in the 2026 legislative session. This goals should be reworded to specify collaboration with the farmers and landowners who have husbanded their land for generations.	Because goals and policies were left largely unchanged from the 2024 Plan, no action was taken. However, staff will revisit this text in the upcoming rewrite of the plan.
Karen Horn	Goal 2 Policies list of measures to protect agricultural soils - consider including paying landowners for carbon sequestration.	Because goals and policies were left largely unchanged from the 2024 Plan, no action was taken. However, staff will revisit this text in the upcoming rewrite of the plan.
Thomas Weiss	Comment C38.A This entire section on "Agricultural Land" is the same as in 2016. Please update the text to provide information on the change in agricultural lands, lands protected, and production between then and now. Please update the text in the paragraph in the draft and in subsequent goals, policies, and strategies.	More substantial changes to the text will be integrated in the upcoming rewrite of the plan.
Thomas Weiss	Comment C42.A This entire section on "Forest Land" is the same as in 2016. The draft notes that Act 171 (2016) amended multiple provisions relating to timber harvesting and forest management. Ten years later, how has Act 171 changed the region? Please update the text in the paragraph and in the relavant goals, policies, and strategies.	More substantial changes to the text will be integrated in the upcoming rewrite of the plan.
Thomas Weiss	Comment C42.B. The draft notes that it is important that productive forestlands be conserved. How well have they been conserved in the last ten years? Please update the text in the paragraph and in the relevant subsequent goals, policies, and strategies.	More substantial changes to the text will be integrated in the upcoming rewrite of the plan.

Who	Working Lands Comments	Response
Thomas Weiss	Comment WD52.A. Not all enterprise areas are used for resource extraction. The National Life property in Montpelier is shown as an enterprise area. Montpelier has two other enterprise areas, neither of which is used for resource extraction. Thus mineral resources need to be shown on a map as mineral extraction areas. Comment WD52.B. Resource extraction areas are lumped in the enterprise future land use category, which is more than just resource extraction. It still seems really hard to guard against the more harmful aspects of mineral extraction if one cannot tell easily which enterprise areas are not used for resource extraction. Resource extraction needs its own map or its own symbols on some other map.	A new map showing resource extraction operations will be considered in the next rewrite.

Who	Land Use Comments	Response
Karen Horn	Land Use Policy Statement. As stated in other sections of the draft plan, many people in Central Vermont rural towns choose to live in rural environments rather than clustered developments and thickly settled areas. Those residences are evident whenever one travels in Central Vermont. Are they "land use shortcomings and impacts of sprawling development patterns" that should no longer be allowed? We believe there are ways to accomodate the rural lifestyle choices outside of clustered development without fragmenting ecologically sensitive, forest or farmlands, and without effectively "slamming the door" behind those already living in rural areas.	The text was altered slightly. CVRPC recognizes that the rural lifestlye is inherent to the region while statewide and regional efforts seek to improve housing density in our centers and neighborhoods. Staff will revisit language for the next rewrite.
Karen Horn	Future Land Use Planning Areas. I am concerned about the regional Future Land Use Planning Area maps and designation as boundaries of state designation. Despite assurances that they are not intended to be "distinct areas of segregated future land uses" under current legislation, it is exceptionally clear that legislation can turn on a dime from suggestive to mandatory. It should be clear that a local land use plan and maps may deviate from state and regional future land use maps if in the municipality's estimation such diferences meet its community vision.	The Compatibility Statement expands on the deference given to municipal plans and goals. Will be revisited during the next rewrite of the plan.
Karen Horn	General Land Use Goal 2. Policy 4 Outdoor lighting should be down directed and limited to minimum levels.	Will be considered in the next rewrite of the plan.
Karen Horn	General Land Use Goal 2. Policy 8 CVRPC encourages the state and municipalities to maintain existing roadside views by means of vegetation clearing at times of year to discourage spread of invasive plants where appropriate.	Will be considered in the next rewrite of the plan.
Karen Horn	General Land Use Goal 4 Policies 2, 4, 5 Structural Best Management Practices (BMPs) should be used… Stormwater management strategies and infiltrations should be allowed to be employed in wetland buffers. Wetland function to absorb stormwater runoff, whether they be natural or contructed wetlands. This may require a rule change at the state level.	Will be considered in the next rewrite of the plan.
Thomas Weiss	Comment 7/23/26 B I find nothing in the draft plan that states whether the regional plan shows that Vermont's air, water, wildlife, mineral, and land resources have been planned for use and development according to the principles of the Act 250 criteria. (Specific goal (c)(6)(A)) Please clarify whether and how those resources have been planned according to those principles	The Act 250 criteria are discussed throughout the Plan, for example the Resource Protection section in the Natural Resources and Working Lands chapter and the accompanying goals and policies. In the next rewrite, more clarity around the Act 250 criteria, and the intersection between Act 250 permitting and regional plans will be considered.
Microsoft Form	Policy is unclear. Landowners "bear financial responsibility" and supporting resource protection seem at odds.	Will be revisted in the next rewrite of the plan.
Microsoft Form	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.	CVRPC recognizes that the rural lifestlye is inherent to the region while statewide and regional efforts seek to improve housing density in our centers and neighborhoods. Staff will revisit language for the next rewrite.
Microsoft Form	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.	Will be revisited in the next rewrite of the plan.
Stephen Whitaker	Criterion (vii) counts "planned" transportation infrastructure and offers one illustration — investments in a municipal capital improvement program adopted pursuant to S 4430. What must an applicant identify to establish that infrastructure is planned?	Underlying layers demonstrating conformance with the FLUAs are displayed on the LURB database. CVRPC followed statute in determining appropriate FLUA classifications.
Stephen Whitaker	Criterion (ii) asks in the present tense whether an area is served by public water or wastewater infrastructure, and contains no planned alternative — unlike criterion (vii), and unlike the parallel Tier IA requirement at IO V.S.A. S which expressly admits "planned improvements." Is that distinction operative?	
Stephen Whitaker	Criterion (iii) asks whether an area is "generally within walking distance." Is there a measure, and must it be stated?	
Stephen Whitaker	Extend the per-parcel attribute request already made at Parts 5 and 14 to include known environmental constraints — CSO-affected drainage, flood hazard, and prime agricultural soils — published in the Commission's public map viewer on the same basis as the criteria attributes already requested.	
Ken Denton	This Rural and Hamlet Policy 3 from the Future Land Use Element section reads" Policies that enable owners of farm and forestland to bear the financial responsibility of resource protection should be supported" reads as if the owner is penalized in some way. Should be clarified in revised document.	Will be revisited and intent clarified in the next rewrite of the plan.

Who	Energy Comment	Response
Nicholas Laskovski	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. 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.	Will be reviewed during the next rewrite of the plan.

*Cross reference with Transportation tab

Who	Transportation Comments	Response
Thomas Weiss	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.	Discussion of road conditions and its causes will be considered in the upcoming plan rewrite.
Thomas Weiss	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.	Will be addressed in the next plan.
Karen Horn	Reduce costs and needs for energy related to transportation. This section needs to acknowledge the tremendous cost associated with sidewalks or multi-use paths and that few if any municipalities in Central Vermot could build such facilities without state or federal financial assitance.	Will be addressed in the next plan.
Karen Horn	Page 135 Strateies b) Working with municipalities to update municipal road standards … to reflect Complete Streets principles where appropriate. Complete Streets strategies do not make sense on rural gravel roads.	Because goals and policies were left largely unchanged from the 2024 Plan, no action was taken. However, staff will revisit this text in the upcoming rewrite of the plan.
Karen Horn	Highways. In Vermont roads are owned and maintained either by the State or the municipality. Put in the statistics - truly amazing. The state maintains approximately 2708 of 15,756 miles of highway in Vermont.	Will be addressed in the next plan.
Karen Horn	Transportation Goal 3. Policies Add a new policy 10 to state "discourage development along Class IV roads"	Because goals and policies were left largely unchanged from the 2024 Plan, no action was taken. However, staff will revisit this text in the upcoming rewrite of the plan.
Karen Horn	Transportation Goal 5. Policy 6. The policy should acknowledge the reality of remote work, which is quite common, and the fact that remote workers do not use the transportation network as regularly as those who commute to work. The climate action and telecommunications discussions should also note this new work mechanism.	Will be addressed in the next plan.
Karen Horn	Transportation Goal 6 Policy 5 The policy should support requiring VTrans to provide bridge and structural condition reports to towns. I have recently heard that those reports are not reliably provided to towns.	Because goals and policies were left largely unchanged from the 2024 Plan, no action was taken. However, staff will revisit this text in the upcoming rewrite of the plan.

Who	Utilities/Facilities/Services Comment	Response
Thomas Weiss	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.	While financing public facilities and utilities is addressed, clarity can be added to further this goal.
Thomas Weiss	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.	While future needs and reccomendations are addressed, elaboration on the topic and additional clarity can be added to further enhance the utilities element.
Thomas Weiss	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)	Staff are working on compiling updated water and wastewater data. This will be updated in the new plan.
Karen Horn	The regional plan should recommend undergrounding utilities where feasible. I understand there is a substantial cost to doing so. There is also a substantial avoided cost during and after extreme weather events.	Will be addressed in the next plan.
Karen Horn	Wastewater systems. The regional plan should call on the Agency of Natural Resources to update its on-site septic regulations to not only accommodate new technologies but also reflect those technology advances in the gallons per day per bedroom requirements.	Will be reviewed during the next rewrite of the Plan.
Karen Horn	The plan states that "combined sewer and storm water systems are still releasing raw sewage to receiving waters during heavy rains." Combined sewer overflows are desinged to overflow in heavy rains. Sanitary sewer overflows are not designed to overflow in heavy rain events. When an untreated or unpermitted discharge occurs, facility operators must follow the procedure for public notice of those discharges to surface waters of the state. I reccomend providing more accurate context to the statement in the plan.	Will be addressed in the next plan.
Karen Horn	This wastewater section should also note that when septic tanks are pumped, the septage is delivered to a municipal wastewater treatment facility that has capacity. Thus, it is in everyone's best interest for aging wastewater treatment facilities to be maintianed to current standards, an enormously expensive and complex endeavor. The plan should also note that sludge, which is a byproduct of wastewater treatment facilities and septic systems must be deposited somewhere, at significant cost to the wastewater facilities.	Will be addressed in the next plan.
Karen Horn	Please note that schools specifically are public water supplies and depend on plentiful, clean water supply for operations.	Will be addressed in the next plan.
Karen Horn	Broadband and Internet Services. Some areas in Central Vermont municipalities have access to entirely inadequate and intermittent internet	Will be elaborated on in the next plan.
Karen Horn	Medical Facilities. The narrative needs to acknowledge that CVMC has eliminated local facilities in the Central Vermont area. CVMC is an arm of the UVM Hospital network. In that capacity, CVMC closed the Mad River Valley clinic, replaicing it with telehealth or going to facilities in other towns. There is no pharmacy in the Mad River Valley. There are signficant drawbacks to providing health care in the Mad River Valley.	Will be addressed in the next plan.
Karen Horn	Libraries. We ask more and more of our libraries and the regional plan should acknowledge those increasing demands. The list in the regional plan should include programs for young children who are not yet in school and their parents.	While the plan mentions some of the programs offered through libraries in the region, this can be elaborated on in the next plan.
Thomas Weiss	Comment WD209.A. Radio. Listenership can no longer be measured solely by those listening to the broadcast. Some stations have gained listenership and financial support through their own streaming. Central Vermont Community Radio (WGDR / WGDH) is an example. The sentence on streaming could be modified to acknowledge that streaming is not always detrimental to a station and can be beneficial.	Will be addressed in the next plan.
Stephen Whitaker	CVRPC's draft Plan, Chapter 6's Communications section, is a descriptive inventory — providers, coverage areas, siting authority under 30 V.S.A. S 248a — but contains no needs assessment and no priority indications for any communications facility. The section identifies one specific vulnerability on its own terms — that "concerns over E-911 and the reliability of wireless service in a power outage are valid and should be carefully considered" — and then states no recommendation to address it. A statement of concern is not a recommendation to meet a future need.	While future needs and reccomendations are addressed, elaboration on the topic and additional clarity can be added to further enhance the utilities element.
Stephen Whitaker	Backup power for wireless, cellular, and public-safety land mobile radio infrastructure must be treated as a higher priority than the Plan currently reflects, because the traditional fallback no longer exists	Will be reviewed during the next rewrite of the Plan.
Stephen Whitaker	The Flood Resilience Element's public-safety and critical-infrastructure mitigation language does not appear to reach communications infrastructure	Will be reviewed during the next rewrite of the Plan.
Stephen Whitaker	The Plan's resilience framework should affirmatively identify sites capable of serving during disasters, not just classify which parcels to avoid building in	Will be reviewed during the next rewrite of the Plan.

Housing Comments

All housing comments have been reviewed. No action has been taken but will be considered in the next rewrite.

Who	Comments
Riley Carlson	The packet does not disclose whether idenfied flood hazard areas and river corridors were removed from the FLUA acreage before that acreage was used in the target calcula on. If they were not, Plainfield's target is inflated by land the town cannot and should not build on, and it is inflated in direct propor on to how much of the village lies in the hazard area, which is considerable.
Riley Carlson	Fundamentally, mapped acreage is a classification output, not a capacity esmate. The packet methodology contains no adjustment for land already developed, slope, wetlands, wastewater capacity, parcelization, or existing zoning density. I would encourage CVRPC to either apply a buildable-land adjustment or to state clearly in the document that the targets are acreage-propor onal and are not capacity-based. It is important to be clear about these limitaons so municipal officials understand and treat these targets with appropriate weight when making planning decisions.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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 with the housing element.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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?
Thomas Weiss	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?
Karen Horn	Quality of Life desires and aspirations: include safe and healthy housing for all.
Karen Horn	Downtown and Village Center Policies #6. "Affordable" needs to be defined. A downtown or village center is not viable if it is host to only "affordable" housing and assisted living facilities. The policy should include support for "missing middle" housing and naturally occurring affordable housing (NOAHs) that may need rehabilitation or weatherization and are home to moderate income residents.

Housing Comments

Karen Horn	Housing, as the plan notes, is the most signficant challenge most communities face, not only in Vermont but across the country. The Town of Moretown seeks to make it easiter to build housing that suits the variety of needs of our current and future residents both in the village and in surrounding areas. People often move to Moretown for the experience of rural living and to raise families. The town supports growing housing in the more densely populated village areas. It should also be possible and affordable to live in more rural parts of town where there is already some housing situated in less compact settlements. Among other considerations, that involves assuring that existing housing units are habitable, weatherized and affordable to a variety of income levels.
Thomas Weiss	Comment C241.A The healthy vacancy rates for owner-occupied homes used by the Vermont Housing and Finance Agency are inconsistent over time, and therefore not to be relied upon.
Thomas Weiss	Comment C261.A The allocation of the 17% of homes owned by their occupants to low-income rentals does not seem morally correct. The morally correct response seems to me to be to plan for coming up with the means to keep these households in the homes they own. And when the existing owners whose incomes are low do sell, planning how to keep the homes as ones owned by the future owners instead of reducing the options for low income households to become home owners. Please revise this text (which is new to this 2026 draft) to plan to retain these homes for the existing occupants, and when the homes are sold, to make them available and affordable for this low-income segment of the population to buy
Thomas Weiss	Comment C264.A The majority of housing will be built outside the Act 250 process. Regional planning commissions will not have the opportunity to participate in much housing development through the Act 250 process. This means that the impact of strategy 12 (active participation in the Act 250 process to support housing) is minimal to non-existent. This seems an ideal location to support specific planning goal 6 (24 V.S.A. 4302(c)(6)(A) by adding to the plan how the principles of the Act 250 criteria will be used to maintain and improve the quality of the listed resources in relation to housing. Please add a strategy along the lines of: "Support maintaining and improving the quality of air, water, wildlife, mineral, and other land resources by use and development of housing in accordance with the principles of the Act 250 criteria (10 V.S.A. §6086(a)), even in instances where an Act 250 permit is not needed."
Thomas Weiss	Comment WD262.A. Figure 15, Age of Central Vermont Housing Stock. The figure shows something like 13,000 houses in Orange County. That seems way too large for only the three towns of Orange, Washington, and Williamstown. Please show only the numbers in the region's three Orange county towns. Showing all distorts the importance of Orange County. This comment also applies to other charts or tables showing Orange County.
Thomas Weiss	Comment WD262.B. Figure 15, Age of Central Vermont Housing Stock. Please provide a table with numbers. For Orange County, only the three towns.
Thomas Weiss	Comment WD272A. Figure 19, Current Distribution of Housing in Central Vermont. It would be useful to have a table with the numbers of each of the three types of units plus the total for each municipality. The table would also have columns for the target allocations for each municipality
Thomas Weiss	Comment WD281.A. Housing Affordability Targets. The text next to the bar chart states that 17% of homeowning households make less than 50% of the Area Median Income. It is not clear what is intended by "In assigning these housing targets, we have allocated this segment of households to future low-income rentals." the text following that statistic intends. It might be intending to have those homeowners moved out of their homes and become renters, losing whatever equity they have in their homes. Or it might mean that it wants to convert those homes into rental units, depriving other low income individuals of the opportunity to become homeowners. I hope neither is the intent. I hope that instead the plan is to plan a way to keep the current low income owners in their homes and that the homes become available for other low income individuals to purchase
Microsoft Form	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.
Microsoft Form	I have a basic question regarding the regional plan: Vermont is losing population every year. In 2025, it lost the highest percentage of residents of all 50 states, and there is no expectation that this trend will not continue given the unaffordability caused by high taxes, along with the dismal results of our education system. So, why does almost every topic of the plan assume or imply that there will be such a growth in Vermont's population? I cannot see why this plan even needs to exist based on our population trend. Why do we need so many more housing units while so many people are leaving Vermont for other states where costs are lower, regulations are fewer, and good jobs are available?
	The Plan should address shelter and hygiene infrastructure for residents who will remain unhoused regardless of new housing production, as a matter within its own housing and equity elements

Who	Economy and Education Comments	Response
Paula Emery	Greenway Inst. is doing this.	Describing how previous college campuses have been repurposed in the region will be considered for the next plan.
Thomas Weiss	Comment 33.B. Page 270. (Education) And the conversion of the Vermont College of Fine Arts to the Greenway Institute should be addressed.	See above.
Thomas Weiss	Comment 33.A. Page 270. (Education). It seems that the closure of the New England Culinary Institute and Goddard College should be addressed.	Will be addressed in the next plan.
Karen Horn	The economic element needs to include references to self-employment and micro-businesses. Although hard to quantify self-employment, home based businesses or even remote work, these enterprises contribute significantly to the regional economy and provide necessary flexibility to those who do that work. From small farming to food products, crafts, art, sole proprietorships, and individual manufacturing, our farmer's markets and artisan shops bear witness to the products of the self-employed. In an AI heavy future, such work may be more valuable and sustainable than ever.	Will be addressed in the next plan.
Thomas Weiss	Comment C266.A Please explain in the plan why the percentage of the adult population with a high school diploma has dropped 5 percentage points. The 2026 draft has a rate of 87.3%. The re-adopted 2016 plan has a rate of 92.6%. Or differently expressed, why has the percentage of the adult population without a high school diploma increased by 70%?	Will be addressed in the next plan.

Implementation Comments

CVRPC carried forward the goals, policies and strategies from the 2024 readoption of the Regional Plan to maintain the language that the Board has reviewed and accepted previously. A more substantial review of the goals, policies, and strategies throughout the text, as well as the implementation plan, will be conducted during the next plan rewrite in order to improve clarity and transparency/accountability.

Who	Comments
Thomass Weiss	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.
Thomas Weiss	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?
Thomas Weiss	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 accomplished as a result of the regional plan's policy. This information should be added.
Thomas Weiss	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 "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?
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	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.
Thomas Weiss	Comment 7/23/26 A. This draft plan has goals, policies, and strategies throughout, hundreds of them. This draft plan also has an implementation plan in chapter 9. The implementation plan has a mere 14 items listed in "Action / Strategy". The problem is, that there is no linkage, no correlation, between the 14 actions / strategies in chapter 9 and the hundreds of goals, policies, and strategies in the draft plan. The problem is exacerbated by the fact that many of the goals polices, and strategies are at least 10 years old. I think that each goal, policy, and strategy (there are hundreds of the combined) needs to be addressed in the implementation plan. And, perhaps, if a goal, policy, or strategy is not in the implementation plan, should it even be included in the regional plan? Please revise the implementation plan to show how each of the hundreds of goals, policies, and strategies will be implemented. And if there is no reasonable expectation of taking action on a goal, policy, or strategy, then remove it from the regional plan.
Thomas Weiss	Comment 7/14/26 A The plan exhibits one of the common lacks of plans. The plan lacks an evaluation of the successes and failures of the previous plan. Please evaluate each of the goals, policies, and strategies in the 2016 plan and revise each of them accordingly in the 2026 plan.