

## MEMORANDUM

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**TO:** Land Use Review Board (LURB)

**FROM:** Addison County Regional Planning Commission (ACRPC)

**DATE:** April 30<sup>th</sup>, 2026

**RE:** Flood Hazard and River Corridor Area Mapping Methodology and Statutory Compliance — Bristol, Middlebury, and Vergennes Planned Growth Areas

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### Purpose

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This memorandum documents the methodology used to evaluate and map flood hazard and river corridor areas within the Planned Growth Areas (PGAs) designated for Bristol, Middlebury, and Vergennes in accordance with 24 V.S.A. § 4348a(a)(12)(B)(iv) and RPC Mapping Guidance (v. 4.0, adopted February 24, 2026). It serves as a record of compliance and a reference for future plan updates or regulatory inquiries.

These three PGAs were identified by the Land Use Review Board (LURB) in its Pre-Application Response Letter to ACRPC as requiring additional information on flood hazard and river corridor mapping to determine whether the PGA designations meet statutory standards. This memo addresses that criterion only. All other statutory criteria applicable to these PGAs are addressed separately.

Four additional PGAs — Ferrisburgh, Panton, Waltham, and Weybridge — were flagged by the LURB as requiring additional information several criteria; those areas are addressed in the companion memo, RE: Planned Growth Area (PGA) Designation — Mapping Methodology and Statutory Compliance

*Please note: To improve readability, ACRPC has elected to use a simplified name for the PGAs rather than the formal naming convention required by the mapping methodology. For example, "Middlebury Town, Middlebury PGA" has been shortened to "Middlebury PGA."*

### Statutory Framework and Mapping Standard

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24 V.S.A. § 4348a(a)(12)(B)(iv) requires that a Planned Growth Area exclude identified flood hazard and river corridor areas, except those areas containing pre-existing development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule.

RPC mapping guidance directs that flood hazard and river corridor areas be excluded from PGA boundaries except where pre-existing development suitable for infill or redevelopment is present, generally focusing such exceptions on the highest-density areas adjacent to a designated center. Where pre-existing development exists within a flood hazard or river corridor area and qualifies under Section 29-201, those areas may be retained within the PGA boundary.

For each municipality below, the analysis describes: (1) the flood hazard and river corridor areas identified within or adjacent to the draft PGA; (2) areas excluded from the PGA boundary; and (3) any areas retained within the PGA boundary as pre-existing development suitable for infill, with the basis for that determination.

### **Definition of “Infill Development” Under § 29-201**

The term “infill development” has a specific, narrow meaning under the Rule. For the purposes of designated centers, § 29-201 defines infill as the construction, installation, modification, renovation, or rehabilitation of land, buildings, structures, facilities, or other improvements in an area that was not previously developed but is surrounded by existing development. Two conditions must be satisfied simultaneously:

- The area was not previously developed. The parcel or area is currently vacant or undeveloped — it has not already been built upon. This distinguishes infill from simple redevelopment of an existing structure, which is treated separately.
- The area is surrounded by existing development. The vacant area sits within an envelope of already-developed land — a gap or hole in an otherwise built fabric, such as a vacant lot in the middle of a downtown block, not an open field on the edge of a settlement.

The policy logic is explicit in the Rule’s preamble: the State promotes infill and redevelopment within designated centers while discouraging new encroachments into undeveloped flood hazard areas and river corridors. An isolated vacant parcel at the fringe of a floodplain would not qualify; a vacant parcel hemmed in on all sides by buildings within a historic downtown core would.

Several practical implications follow from this definition and are applied in the municipal analyses below:

- The exception applies to areas containing pre-existing development in areas suitable for infill. This means the flood hazard or river corridor area itself must already contain some development, and the infill opportunity must be within that developed context, not simply adjacent to it.
- Purely greenfield land within a flood hazard area or river corridor, even if adjacent to a designated center, does not qualify. RPC mapping guidance reinforces this by directing that exclusions generally apply outside the highest-density areas immediately adjacent to the center.
- The center character of the surrounding area matters. The infill exception applies in a downtown or village context. Areas where the surrounding fabric is already developed at an urban or village scale.

## **Bristol**

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*See Exhibit A for reference maps*

## **Flood Hazard and River Corridor Areas Identified**

The flood hazard and river corridor areas in Bristol are located south of downtown, along the New Haven River. Most of the PGA is located on a bluff that rises above the New Haven River. The areas of the PGA that are affected by the flood hazard and river corridor areas are all south of Route 17.

## **Areas Excluded from the PGA Boundary**

All identified flood hazard and river corridor areas were excluded. No areas were identified as suitable for infill. The boundary of the PGA was clipped to the boundary of the flood hazard and river corridor areas.

## **Areas Retained as Pre-Existing Development Suitable for Infill**

All identified flood hazard and river corridor areas were excluded.

## **Middlebury**

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*See Exhibit B for reference maps*

## **Flood Hazard and River Corridor Areas Identified**

The flood hazard and river corridor area of Middlebury split the PGA and Downton Center from north to south, running along Otter Creek.

## **Areas Excluded from the PGA Boundary**

Middlebury zoning bylaws prohibit any new development, including infill, in flood hazard areas. ([Middlebury Zoning and Subdivision Regulations, adopted September 13, 2022, Pg. 124](#)). The flood hazard areas are inclusive of all river corridor boundaries in Middlebury. Therefore, all flood hazard and river corridor areas were excluded from the Middlebury PGA. The boundaries of the PGA were clipped to the boundaries of the flood hazard area.

## **Areas Retained as Pre-Existing Development Suitable for Infill**

All identified flood hazard and river corridor areas were excluded.

## **Vergennes**

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*See Exhibit C for reference maps*

## **Flood Hazard and River Corridor Areas Identified**

The flood hazard and river corridor areas of Vergennes split the PGA and Downton Center from north to south, running along Otter Creek.

## **Areas Excluded from the PGA Boundary**

ACRPC excluded the area west of Otter Creek to the southern part of town that is currently used as an agricultural field. The area is part of a parcel that has been developed as a PUD. However,

the field areas, which are located within the Flood Hazard Area, are currently undeveloped. The undeveloped fields are not immediately adjacent to the central core. The boundary of the PGA was snapped to the flood hazard area boundary rather than the parcel boundary in this area to exclude the agricultural fields.

### **Areas Retained as Pre-Existing Development Suitable for Infill**

ACRPC retained parcels in the flood hazard and river corridor area on the east bank of Otter Creek because these are high density areas with pre-existing development that are adjacent to the central core of Vergennes.

Additionally, ACRPC retained parcels in the flood hazard and river corridor areas on the west bank of Otter Creek. To the north of Route 22A, ACRPC retained the municipal wastewater treatment plant and a parcel used by Green Mountain Power. To the south of Route 22A, ACRPC retained high density parcels that are adjacent to the central core.

## **Summary and Conclusion**

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The flood hazard and river corridor mapping for the Bristol, Middlebury, and Vergennes PGAs was conducted in accordance with 24 V.S.A. § 4348a(a)(12)(B)(iv) and the RPC Mapping Guidance (v. 4.0). In each case, identified flood hazard and river corridor areas were excluded from the PGA boundary except where pre-existing development suitable for infill was present adjacent to the designated center, consistent with Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule.

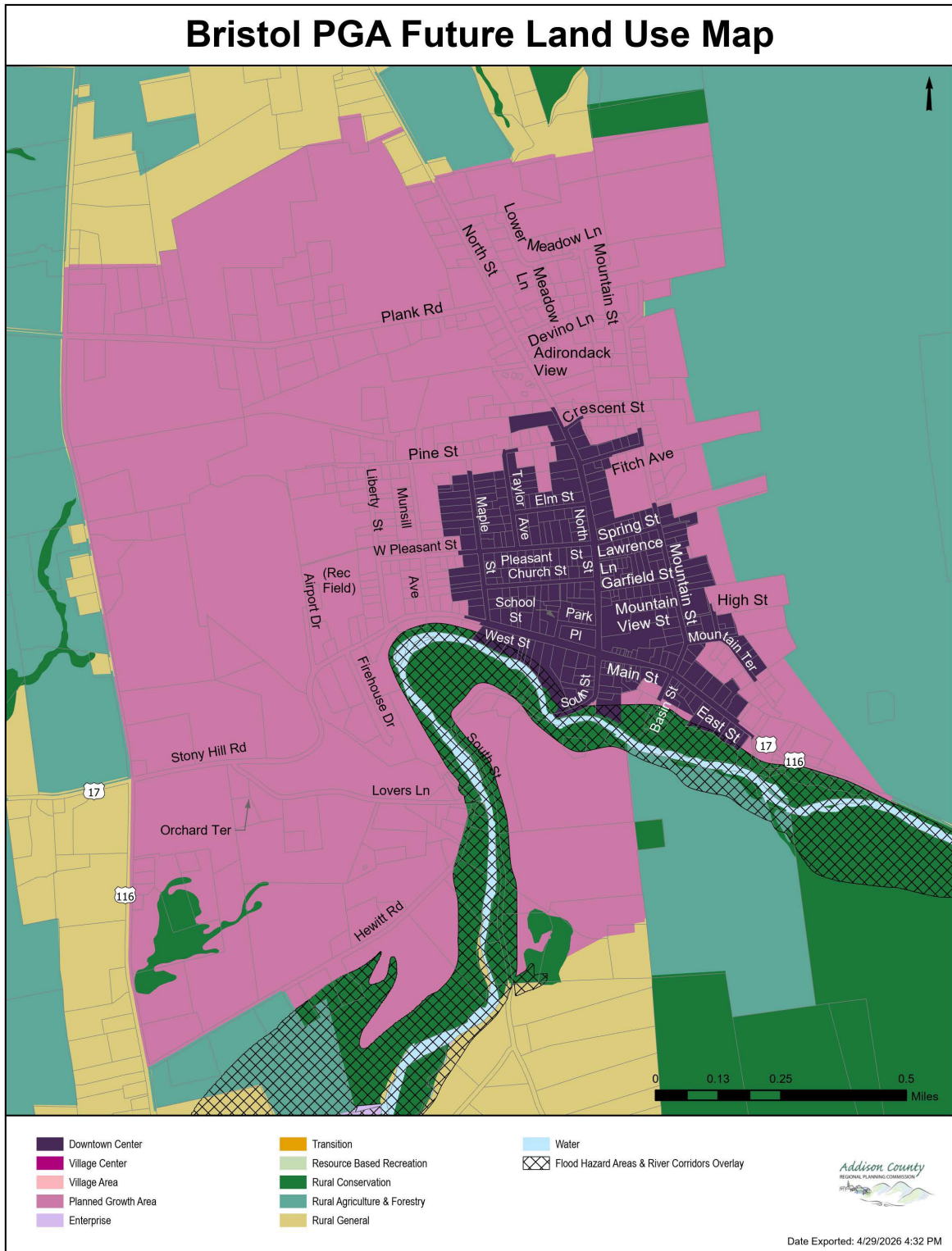
This memo, together with the supporting maps referenced herein, constitutes the documentation of flood hazard and river corridor compliance for the Bristol, Middlebury, and Vergennes PGA designations. Questions may be directed to Adam Lougee at [alougee@acrpc.org](mailto:alougee@acrpc.org)

## **Exhibits**

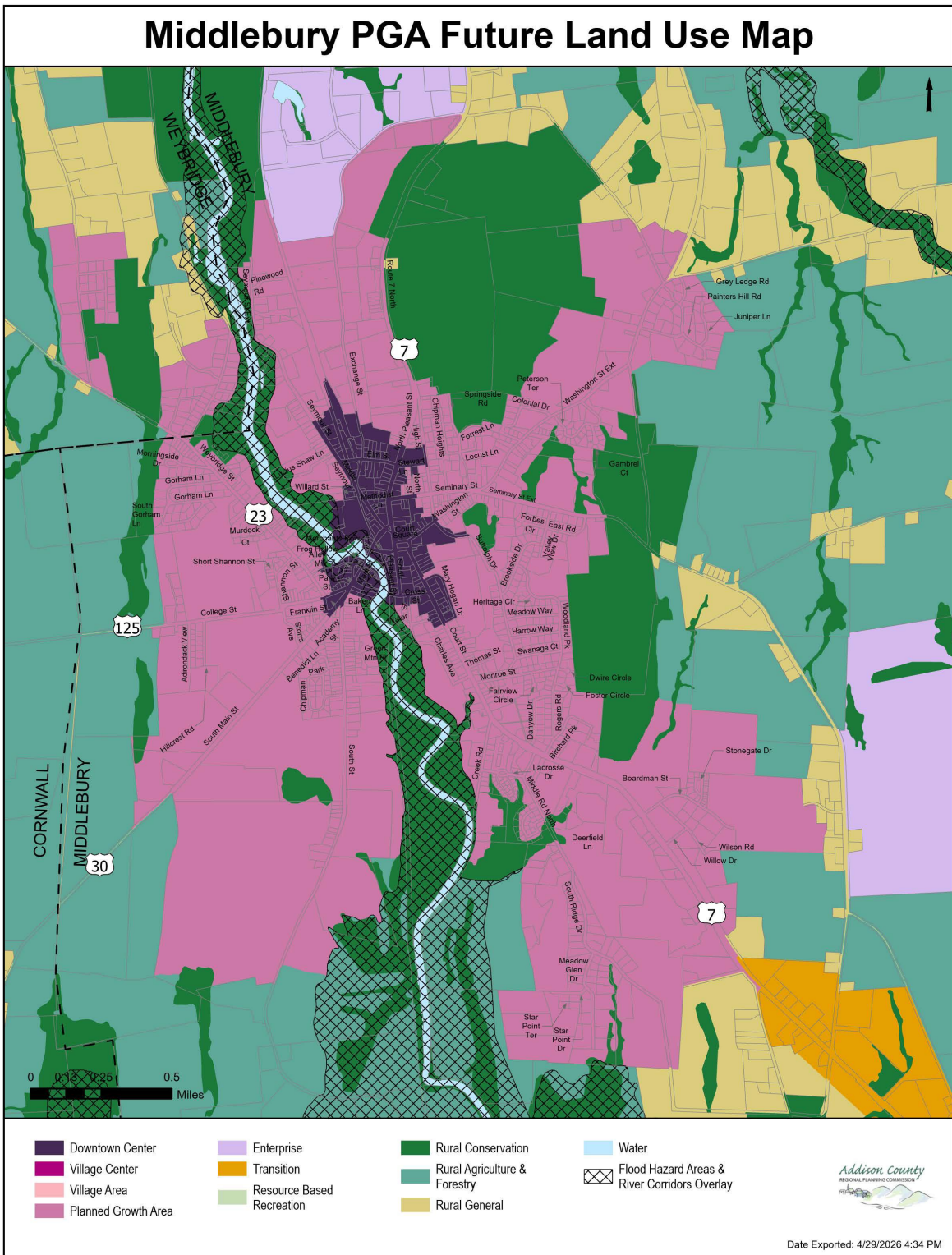
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- Exhibit A: Bristol PGA Boundary Map with Flood Hazard and River Corridor Overlay
- Exhibit B: Middlebury PGA Boundary Map with Flood Hazard and River Corridor Overlay
- Exhibit C: Vergennes PGA Boundary Map with Flood Hazard and River Corridor Overlay

# Exhibit A: Bristol PGA Boundary Map with Flood Hazard and River Corridor Overlay



# Exhibit B: Middlebury PGA Boundary Map with Flood Hazard and River Corridor Overlay



# Exhibit C: Vergennes PGA Boundary Map with Flood Hazard and River Corridor Overlay

