

# ACRPC Regional Plan Comprehensive Change Memo

September 24, 2026

ACRPC submitted the Draft Regional Plan to the Land Use Review Board (LURB) and the public on January 23, 2026. Following that submission, ACRPC has received comments from the Land Use Review Board, state agencies, and the public that have resulted in both substantive and non-substantive changes to the plan during the hearing process. In addition, internal staff review and changing guidance has also resulted in changes to the plan.

Below you will find a table of the comments received organized by chapter of the Regional Plan and the ACRPC response. Some of these comments as well as additional staff review resulted in edits ACRPC considers substantive and those changes are listed below the relevant tables.

## Introduction

| Source | Type     | Recommendation / Comment                                                                                                                                                                                                                                        | ACRPC Response / Notes                         |
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| LURB   | Advisory | Provide an implementation matrix, with actions and indicators of progress to more clearly indicate ACRPC's role in meeting the goals and policies outlined in the plan. Consider also including an indication of costs and potential partners for such actions. | ACRPC has chosen not to implement this change. |

## Chapter 1: Natural Resources

| Source | Recommendation / Comment                                                                                                                         | ACRPC Response / Notes                             |
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| LURB   | Consider referencing the Agency of Natural Resources "Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont." | The recommended text has been added to Ch. 1 text. |

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| LURB   | Consider providing the percent of forested and agricultural lands conserved, by biophysical region.                                                                                                                                                                                                                                                                                                                                                                                                                      | ACRPC is not able to perform this analysis because we do not have access to a clear breakdown of agricultural land vs non-agricultural land.                      |
| ANR    | With respect to Act 59, the Plan notes 33% of the region is conserved. It would be interesting to understand the breakdown of conservation methods for the lands outside of GMNF (UVA, land trust easements etc.) and the acres of agriculture versus forested landscapes.                                                                                                                                                                                                                                               | ACRPC is unable to perform this analysis at this time, but would welcome the opportunity to work with ANR to explore this.                                        |
| ANR    | The Wetlands Program is updating the National Wetlands Inventory maps. This process is ongoing and some areas of the region have final drafts available. The Region may want to consult the draft maps prior to adjusting FLUA to better understand present extents of mapped wetlands and development potential.                                                                                                                                                                                                        | ACRPC has incorporated the wetlands map update with the best data available at the time of the FLUA update.                                                       |
| ANR    | The plan includes a thorough description of vernal pools and their importance for amphibian habitat. Map 12 includes locations of vernal pools. ACRPC may want to consider using different symbology as it is difficult to see their general locations. Additionally, the ANR atlas now includes data from Vermont's Vernal Pool Atlas which may include additional pools not identified on Map 12. The region may want to ensure the most recent RTE layers from the ANR atlas are published as the layers are updated. | ACRPC has incorporated these comments and utilized the best available data at the time of the FLUA update.                                                        |
| Public | A resident would like the region to better incorporate a discussion of the maple sugaring industry, its economic influence, contributions to forest management, the impacts of climate change, etc.                                                                                                                                                                                                                                                                                                                      | ACRPC feels the maple industry is incorporated in this plan without prioritizing it above others in the region.                                                   |
| Public | Resident from Middlebury comments that Table 2 in the Natural Resources section about agricultural statistics covers the period from 2002-2022. She would like to see similar information for the Table on 303d impaired waters. Have those numbers changed over time?                                                                                                                                                                                                                                                   | Because Table 1 (303(d)) lists rivers and violations rather than statistics like Table 2 (e.g., number of farms), the ACRPC Natural Resources committee concluded |

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|  |  | there was no suitable way to apply the same change-over-time analysis used in Table 2. |
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## Summary of Substantive Changes from Draft to Final

1. In response to comments from the Agency of Natural Resources, Map 12 (page 20) has been updated to include new data from Vermont's Vernal Pool Atlas to ensure all vernal pools are reflected.

## Chapter 2: Energy

| Source | Recommendation / Comment                                                                                                                                                                                                                                                                   | ACRPC Response / Notes                                                                                                                 |
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| PSD    | On pg 6, clarify that Figure 4 represents how fuel use could evolve if ACRPC meets their energy and GHG reduction targets, since this is what is modeled in the CAP Mitigation Scenario.                                                                                                   | Text is updated as requested.                                                                                                          |
| PSD    | Pg 7 current transportation use: the data in Figure 5 looks like it comes from the modeled Vermont Pathways LEAP model — if so, it should specify the modeled year and which scenario (the BAU scenario seems more appropriate than the mitigation scenario for estimates of current use). | Title and description have been corrected.                                                                                             |
| PSD    | Table 4, pg 10 — please provide a date range for the 5-year average commercial thermal energy demand.                                                                                                                                                                                      | Title updated and text corrected to state thermal energy not total energy.                                                             |
| PSD    | Label for Table 26 appears to be a typo — it is a repeat from Table 25 (commercial CCHP).                                                                                                                                                                                                  | Title is corrected.                                                                                                                    |
| PSD    | In the page numbers provided, do not see an 'evaluation' of transportation system changes and land use strategies needed to                                                                                                                                                                | “One source of evaluation that supports a key land-use goal of increased density of development are the housing target goals discussed |

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|     | <p>achieve targets (as the standard asks for). Do you evaluate or discuss these needs elsewhere in the plan that you could reference?</p>                                                                                                                                        | <p>and enumerated on pages 22 through 25 of Chapter 5 (Population and Housing). At least 60% of new housing is proposed for in Village development. Specific strategies that promote the “gentle infill” strategy suggested for the region can be found on pages 26 through 28 of Chapter 5. Regarding Transportation system changes, the LEAP targets for EV and PHEV adoption for the region can be found in Table 12 on page 29 of Chapter 3 (Energy) which illustrates the scale of EV and PHEV adoption required to meet transportation system electrification goals. Similar analysis is reflected on page 3 of the Chapter 2 (Transportation): “To meet State-established greenhouse gas reduction targets, 90% of all vehicles will need to be powered by electricity by 2050.” Tri-Valley Transit’s goal to move from 10% fleet electrification in 2025 to 100% fleet electrification by 2050 to meet state greenhouse gas goals, discussed on page 20 of the transportation sector, is another form of evaluation of the scale of change needed to meet (public) transit energy goals.</p> |
| PSD | <p>Tables 29–31 in the Appendix (pgs. 16–17) are labeled 'municipal' yet reference Table 32 which is labeled 'regional'. Table 32 does not include end uses as it should and is a repeat of Table 31. There is no Table 33 although the description on pg 16 references one.</p> | <p>Corrections have been made as suggested.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| PSD | <p>Do not see targets set for 'use of renewable energy for electricity' — these would typically come from use of the Generation Scenario tool provided by the PSD.</p>                                                                                                           | <p>The 2050 generation target is mentioned on page 13, but coverage is more extensive on page 29 and 30 (see Table 14 as well). The electricity use by sector targets are included in the appendix</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                | material by sector in Tables 19, 20, 21, and 26.                                                                 |
| PSD | To fully meet Standard 9E, policies and objectives to accompany maps and preferred, potential, and unsuitable sites should be clearly articulated.                                                                                                                                                                                                                                                                             | Siting standards and map descriptions have been added to the chapter (pg. 21-25) and chapter 2 appendix (pg. 12) |
| PSD | Page 13 — The 2024 Long-Range Transmission Plan found need for considerable load management even within the ten-year horizon, not just the 20-year horizon. Important also to address transmission costs associated with in-region generation targets. The 194,826 MWh target corresponds to at least 130 MW in-region capacity, which exceeds transmission capacity by about 100 MW and would come with considerable cost.    | Content responding to this comment has been added to Chapter 2, pg 20.                                           |
| PSD | Curious about the rationale for the policy advocating for 'globalizing costs for residential-scale distributed generation while requiring commercial/industrial generators to fund improvements.' Commercial & industrial generators generally pay for upgrades to safely interconnect but all sizes cause incremental reductions in hosting capacity. Utility regulatory policy requires 'cost causer [or beneficiary] pays.' | Text has been updated to clarify intent of the plan.                                                             |
| PSD | Curious about the emphasis on co-locating solar & storage (e.g., p. 21). The benefits of storage don't depend on it being physically located adjacent to the solar project, and sometimes more net grid benefits can be accrued through strategic siting of storage that may not be right next to a solar project.                                                                                                             | Text has been updated to clarify intent of the plan.                                                             |

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| PSD    | Appendix Page 5, Table 15 — Were town 2025, 2035, and 2050 generation targets by technology type derived? If so, please provide, and additionally please provide the Generation Scenarios tool workbook used to calculate the targets.                                                                                                                                                                                                                                                                                                                | No change made at this time                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| PSD    | Typo in the 'benefits and burdens discussion' on pg 13 regarding Affordable & Clean Renewable Energy in Chapter 10 (Equity): 'A detailed analysis of the burdens and benefits of the recommended Goals, Objectives, and Actions of the Energy Section can be found in Appendix X' — the appendix reference appears incomplete.                                                                                                                                                                                                                        | Corrections have been made as suggested.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Public | A resident from Middlebury noted she had some administrative editorial suggestions that she would provide for staff. She noted that her main concern involved what she saw as a contradiction in the Energy section of the Plan. She noted the plan states it intends to move away from fossil fuel use, but that it still allowed the use of the Addison Natural Gas pipeline. While the plan states it is encouraging the use of renewable natural gas, she does not believe that much of the gas supplied to the Region is from renewable sources. | The staff discussed the notion of including limits to new fossil fuel infrastructure in the Region. While it understands the climate impacts of natural gas, it also notes that, at point of consumption, natural gas produces less GHG emissions than other fossil heating sources that folks currently use, that the transition to renewable natural gas would rely on the same distribution infrastructure, that pairing renewable gas systems with heat pumps is still an option that would improve resilience of the built infrastructure, that town-wide gas distribution networks could have other heating uses such as the distribution of thermal energy generated locally at a future point, and that municipalities do have the ability to express their own fossil fuel preferences via energy and enhanced energy plans. As such, the RPC declined to adopt language that prohibited new natural gas distribution infrastructure. |

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| Public | A seasonal resident in Ferrisburgh who develops utility scale wind and solar projects was concerned that the energy goals regarding renewable resources are unrealistic. Another resident noted that an on-going challenge is storage of energy from peak generation time | On the topic of energy development. The staff discussed these notions and note that ACRPC has met its regional distributed generation targets for 2025 and 2035, and so it is suggesting that a more balanced approach to renewables development in the Region to meet its 2050 goal is reasonable. It notes that state and regional land-use and conservation goals suggest that a balanced approach is appropriate as well. Further, it notes that municipalities are welcome to develop their own siting and design standards within their enhanced energy plans which would receive substantial deference in the siting decisions made by the public utilities commission. Additionally, there were no proposed changes rendered with the comment, and so it would be difficult to know which specific elements the commenter thought should be changed. As such, no changes were made. On the topic of storage. The RPC agrees that storage is a critical element of the energy transition, that it is particularly helpful to adopt in locations with abundant local supply and/or that frequently lose electrical service, and, as such, supports additional energy storage in multiple locations in the plan. As such, no changes were made. |
| Public | Resident from Ripton he also commented on the Energy Chapter, p. 2 noting that it included significant CO2 reduction targets. He noted if we increase the supply                                                                                                          | While this may be the case, if new housing is designed in such a way as to meet RBES standards (reduced heating demand + electrification), is done in a compact manner, and is located                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|  | <p>of housing it will be exceedingly hard to hit those targets.</p> | <p>near current developments (transportation), then that new housing will have a significantly lower impact on the region's residential greenhouse gas production than its current housing stock. It is also worth noting that LEAP targets are updated with every new enhanced energy plan and factor in regional population and land-based characteristics, and so it is likely that the region's total targets would increase if the region's housing did grow at a rate that is substantially greater than elsewhere in the state. Targets have been right-sized to the community over time. Because recommendations contained within the energy plan already encourage those aforementioned mitigating factors, no changes were made.</p> |
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### Summary of Substantive Changes from Draft to Final

1. The discussion of new renewable generation has been supported by the addition of energy generation siting standards. The proposed text can be found at the link provided and has been located in the Energy Chapter: <https://acrpc.org/wp-content/uploads/2026/04/Regional-Energy-Project-Siting-and-Design-Standards-ACRPC-Draft-2026.pdf>
2. The following text in the Goals, Objectives, Actions list (pages 20-22) has been updated as indicated below.
  - a. Goal 6, Objective 1, Action a – edited to incorporate any energy technology and the added siting standards
    - i. Original text: *Analyze the feasibility and support the installation of additional municipal solar and/or wind net-metering facilities that are compliant with the standards enumerated in this plan to off-set municipal electric use.*
    - ii. New text: *Analyze the feasibility and support the deployment of municipally owned, leased, or otherwise operated distributed*

*generation facilities that are consistent with the Regional Energy Project Siting and Design Standards.*

- b. Goal 6, Objective 1, Action b added
    - i. New Text: *Support the development, implementation, and ongoing evaluation of Municipal Enhanced Energy Plans.*
  - c. Goal 6, Objective 2, Action a – edited to incorporate new siting standards
    - i. Original Text: *Work closely with the municipalities impacted by proposed energy development projects to ensure responsibly sited and developed renewable energy projects are implemented in the region.*
    - ii. New Text: *Work closely with municipalities affected by proposed energy development projects to evaluate whether those projects are consistent with the Regional Energy Project Siting and Design Standards.*
  - d. Goal 6, Objective 2, Action b – edited to incorporate new siting standards
    - i. Original text: *Expand regional and local energy storage and promote local microgrids to improve energy system reliability and resiliency.*
    - ii. New Text: *Support the expansion of energy storage, microgrids, and other energy system infrastructure in locations and with designs that are consistent with the Regional Energy Project Siting and Design Standards.*
  - e. Goal 6, Objective 2, Actions C and D – deleted to reduce repetition.
- 3. Staff review revealed that two tables titled Table 32—Regional Residential Incremental Annual MWh- by End-Use and Table 33 - Regional Non-residential Incremental Annual MWh- by End-Use were lost from the energy appendix (page 17) in editing. The tables has been included in the final draft.
  - 4. As a result of new research performed on behalf of the RPC by UVM students, additional information on potential generation from solar canopies in Addison Region has been included on page 16 and in the map package in the Chapter 2 appendix.

### Chapter 3: Transportation

| Source | Recommendation / Comment                                                                        | ACRPC Response / Notes                                  |
|--------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| LURB   | On page 8 of the Transportation Chapter, high-priority scores for bridges are noted but not the | Text changes have been made to clarify the relationship |

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|      | sufficiency ratings that these are based on. Consider explaining this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | between sufficiency ratings and regional planning for local bridges.                                                                                                                                                                                                                                                                                                                                                                                 |
| LURB | Consider explaining that bridges less than 20 feet in length are the responsibility of municipalities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The correction has been made as suggested.                                                                                                                                                                                                                                                                                                                                                                                                           |
| LURB | The AOT Act 181 Transportation Support Study (December 2025) includes recommendations to strengthen the role of RPCs. To address potentially significant traffic impacts from development in Tier 1A and 1B areas (no longer subject to Act 250 review), consider revising the plan to: (1) add detail about how to address the anticipated need for increased transportation infrastructure planning, (2) support alternative new or leveraged local or state regulatory review processes to address mitigation of traffic from development no longer subject to Act 250 review, and (3) incorporate policies or planned actions which align with the December 2025 AOT Act 181 Study. | New text has been added to Chapter 3 in the following manner: ACRPC recognizes that new housing development has impacts on other infrastructure like transportation and intends to work with VTrans and other agencies to address. In planned growth areas and villages, ACRPC's policy will be to require new development to include transportation infrastructure including walkability, bike infrastructure etc. to ensure efficient circulation. |
| LURB | Identify the priorities of needs, costs, and methods of financing future needs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | New text has been added to Chapter 3 in the following manner: As part of our business in the ordinary course, we work with TAC and VTrans to prioritize the needs for future projects, identify alternatives, costs and financing.                                                                                                                                                                                                                   |
| AOT  | There has been significant investment in the rail line in Addison County, including the Middlebury Tunnel, facilitating passenger rail stops in Middlebury and Vergennes/Ferrisburgh. An outline of how this is mutually supportive and integrated into the overall regional network could help guide future investments for pedestrians, bicyclists, and public transit routing. Transit-Oriented Development studies currently underway in Middlebury and Vergennes/Ferrisburgh would be good to reference.                                                                                                                                                                           | Additional text has been added to Chapter 3 in response to this comment.                                                                                                                                                                                                                                                                                                                                                                             |

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| AOT    | The written description of the Triangle Bike Loop could be complemented by a map showing this low-stress network connection between the region's larger population areas.                                                                                                                                                                                                                                                                                               | An existing map of bike routes in the region has been moved to Chapter 3 in response to this suggestion.                                                                                                                                                                                                                            |
| AOT    | To fully meet the goal, inclusion of a map showing parking facilities, transit routes, terminals, scenic roads, airports, railroads and port facilities would be advisable.                                                                                                                                                                                                                                                                                             | An existing map of bike routes in the region has been moved to Chapter 3 in response to this suggestion.                                                                                                                                                                                                                            |
| AOT    | The Transportation Appendix addresses priorities of need by outlining action items with timeframes but does not currently address potential costs. Consider amending the appendix to include a \$ – \$\$\$ range to show anticipated relative magnitude of cost for each action item. Also consider renaming the 'Responsible' column to 'Partners' to better reflect overlapping jurisdictions.                                                                        | The appendix was adjusted as suggested.                                                                                                                                                                                                                                                                                             |
| AOT    | Middlebury's Airport parcel should be designated 'Enterprise' with the designation snapping to parcel boundaries. The Agency concurs with ACRPC's Resource Based Recreation designation for Basin Harbor airport (seasonal, single-engine and smaller aircraft only).                                                                                                                                                                                                   | ACRPC declines to make the suggested change. The Middlebury Airport is primarily designated as an enterprise area. In response to public comment and a request from the Middlebury planning commission, a portion of the parcel is currently conservation to preserve the buffer between the airport and surrounding neighborhoods. |
| Public | There should be mention of Hollow/Old Hollow Road as an increasingly busy through connector between Route 116 and Route 7 (Ch. 3, pg 15). Surprised there is no mention of high-profile truck fires on Route 7 in Ferrisburgh in 2023–2024 (Ch. 3, pg 16). On roundabouts on Route 7 — surprised to see recommendation for roundabouts on the northern end of Route 7 when AOT determined that a roundabout was not viable at the Route 7/Old Hollow Road intersection. | Text has been added to address the issues raised.                                                                                                                                                                                                                                                                                   |

## Summary of Substantive Changes from Draft to Final

1. Addition of appendix materials that include specific project recommendations as well as the suggested location, responsible party, and timeframe of the proposed project. The newly incorporated items cover the topical areas of:
  - a. Air Transport
  - b. Rail Transport
  - c. Truck Traffic and Freight
  - d. Agriculture Impact
  - e. Travel Demand Management
  - f. Promotes Economy
  - g. Safe modes of Travel
  - h. Energy Efficiency and Conservation
  - i. Electric Vehicles
  - j. Enhancing Regional Land Uses and Sense of Place
  - k. Resilience to Natural Hazards
  - l. Sufficient Funding
2. Additional changes have been made to the appendix, in response to LURB and Agency of Transportation comments, to provide cost range estimates for each project recommended while the Responsible column has been split into two columns indicating the project Lead and project Partners respectively.
3. In response to public comment a brief discussion of recent truck fires on Route 7 has been added to page 16 of the chapter.

#### **Chapter 4: Community Infrastructure**

| <b>Source</b> | <b>Recommendation / Comment</b>                                                                                                                                                                                                                                   | <b>ACRPC Response / Notes</b>                |
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| LURB          | Consider including timelines and funding strategies to help support and ensure timely implementation of infrastructure projects.                                                                                                                                  | ACRPC declines to make the suggested change. |
| LURB          | The Community Infrastructure Chapter includes limited information on emergency management. The Flood Resilience Chapter should be referenced for further detail.                                                                                                  | A reference was added as suggested.          |
| LURB          | The Community Infrastructure Chapter contains information on trails that is separate and different from the trails discussion in the Transportation Chapter. The Transportation Chapter identifies ADA requirements and concerns. The Trail Use Conflicts section | ACRPC declines to make the suggested change. |

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|        | may be best included in the Transportation Chapter instead of the Community Infrastructure Chapter to identify the competing needs and uses and impacts on design.                                                                                                                                             |                                                                                                      |
| LURB   | The Community Infrastructure Chapter could use stronger goals around infrastructure supporting future land use growth areas.                                                                                                                                                                                   | A new action has been added to this chapter to strengthen support for housing infrastructure.        |
| LURB   | Identify recommendations to meet future needs for all utilities and facilities, with indications of priority of need.                                                                                                                                                                                          | ACRPC declines to make the suggested change.                                                         |
| LURB   | Consider discussion of the significant 2019/20 peak in Mount Abe High School enrollment illustrated in Figure 2 on page 34 of the Community Infrastructure Chapter.                                                                                                                                            | Upon review, ACRPC confirmed the jump in enrollment was an error in the data and has been corrected. |
| Public | Page 33, Map 7: Addison Central School is shown on the map while the school was closed in June 2021. Ripton is shown without an elementary school (this happened in FY26 — keep as it is more accurate). Picture caption at bottom left shows MUMS Soccer fields labeled as Recreational Fields in Middlebury. | The correction has been made as suggested.                                                           |

### Summary of Substantive Changes from Draft to Final

1. Staff review revealed that a page of content on community health was lost during editing. This content was restored and can now be found on pages 24 and 25 of the current draft.
2. Corrections to the data presented in figure 2 (page 34) and Map 7 (page 33) has been made to provide more accurate information.
3. In response to comments from the LURB a new Action b has been added to Goal 5, Objective 2 (page 42):
  - a. New Text: *Support the planning, development, financing and construction of new municipal water and wastewater systems to encourage development in village centers, villages, downtowns, and planned growth areas.*

### Chapter 5: Population & Housing

| Source | Recommendation / Comment                                                                                                                                                                                                                                                                                        | ACRPC Response / Notes                                                                                                                                                                                        |
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| LURB   | Pages 6, 15, 18, and 20 all have boxes titled "COVID 19 Pandemic" — consider distinguishing these boxes with subtitles. Also, some refer to numbered boxes that could not be located.                                                                                                                           | ACRPC has added clearer title content and direct the reader to the footnotes when appropriate.                                                                                                                |
| LURB   | Figures 2 and 3 on page 2 are too small — consider combining and showing on one full page.                                                                                                                                                                                                                      | Adjustments have been made to address this suggestion.                                                                                                                                                        |
| LURB   | Figure 6 — don't show white population with the rest, as this overwhelms the data for the smaller groups.                                                                                                                                                                                                       | ACRPC declines to make the suggested change. We feel it is important to represent the entire population in Figure 6. Data labels have been added so that the value of the smaller bars are still represented. |
| LURB   | Page 16 reference in the narrative to Table 4 is actually a reference to Table 3. Correct this.                                                                                                                                                                                                                 | The correction has been made as suggested.                                                                                                                                                                    |
| LURB   | Page 22 mentions that PGAs and village areas are eligible for CIP designations and Act 250 exemptions. Add Downtown and Village Centers to this.                                                                                                                                                                | The correction has been made as suggested.                                                                                                                                                                    |
| LURB   | Consider presenting more analysis of current growth rates and comparing them to those necessary to achieve housing targets, especially with respect to the growth areas. It was indicated at the public meeting that the growth rate will need to double to meet targets.                                       | Text has been added to address this suggestion.                                                                                                                                                               |
| LURB   | Pages 22–23 present municipalized housing targets but do not discuss how they were municipalized nor where the regional targets came from. A Housing Targets box on page 8 of Chapter 8 discusses how targets were established. Consider (i) relocating the box from Chapter 8 to Chapter 5, and (ii) including | Content has been moved and modified as suggested.                                                                                                                                                             |

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|        | the explanation provided within Exhibit 016 on page 29 within Chapter 5.                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                              |
| LURB   | Consider identifying affordability goals within the housing target information.                                                                                                                                                                                                                                                                                                                                                    | The correction has been made as suggested.                                                                                                                                                                                   |
| LURB   | 3.3% of the County is proposed to be eligible for Tier 1B. The goals for the Population and Housing Chapter could include a goal to support communities opting in to Tier 1B to incentivize housing.                                                                                                                                                                                                                               | We believe page 30 Goal 1, Obj 5, A of Chapter 5 addresses this issue sufficiently.                                                                                                                                          |
| LURB   | Figure 13 on page 12 of the Population and Housing Chapter appears to be mislabeled. Correct this.                                                                                                                                                                                                                                                                                                                                 | The title has been corrected.                                                                                                                                                                                                |
| LURB   | On page 27 the following reference is made: "...Village Center and Downtowns and their planning areas..." Clarify that Downtown Centers, Village Centers, Planned Growth Areas, and Village Areas are the FLU areas that are eligible for the community investment designations.                                                                                                                                                   | The correction has been made as suggested.                                                                                                                                                                                   |
| LURB   | The purpose of the figure on page 28 is unclear — clarify its purpose.                                                                                                                                                                                                                                                                                                                                                             | This was not intended as a diagram, but rather an image placeholder for a future draft. The image has now been replaced.                                                                                                     |
| LURB   | The chapter is titled "Population and Housing," but other than census-derived household characteristics and historic population trends, population data is presented more fully in the Economic Development chapter. Consider retitling the chapter to just "Housing."                                                                                                                                                             | ACRPC has chosen to maintain the original chapter title.                                                                                                                                                                     |
| Public | On June 10 <sup>th</sup> a resident from Ripton affirmed that the target population increases assigned to Addison County are based on faulty assumptions that were extrapolated from COVID years. The housing targets don't need to be so ambitious. The same resident from Ripton spoke to P. 7 of the Population and Housing Section on July 8 <sup>th</sup> . He noted that population growth in the region had been flat for a | The population of Addison County and the State has been level over the past 25+ years. What has changed is the size (# of people) per household. Today (2026) there are more smaller households (1-2 people living together) |

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|        | <p>long time and therefore questioned the need for the housing growth targets.</p>                                                                                                                                                              | <p>then there was 30+ years ago. This different arrangement requires more housing units, and these units should be smaller to meet the needs of smaller households.</p> <p>The ACRPC is not advocating population growth. The plan supports housing growth where it is needed to support existing residents needing homes as well as folks that want to live here to be near families and employment. Currently, there is a near 0% vacancy rate for housing in the Addison Region which does not support a healthy local economy or community.</p> <p>ACRPC collaborates with housing support organizations in their work to alleviate homelessness. The Regional Plan advocates creating save and affordable housing for all segments of the population.</p> |
| Public | <p>Anonymous is concerned that their Village Area (New Haven) doesn't have the capacity for infill due to shallow wells and limited water resources. Please make suggestions for growth where there are actual resources to support growth.</p> | <p>The areas for growth on the Regional Future Land Use Map were developed working with each town's planning commission. The</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|  |  | map is a planning tool, and any proposed development would be required to go through the local planning/permitting process before moving forward. The plan states that 40% of the housing targets for municipalities would be located outside the Village Area. |
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### Summary of Substantive Changes from Draft to Final

1. In response to LURB comments the discussion of new regional and municipal housing targets has been consolidated in Chapter 5 (page 22-23) and improved with a table providing a breakdown of the 2050 housing targets by tenure, affordability, type and size.
2. References to Tier 2 and Tier 3, relating to Act 181 changes, has been updated to reflect that all land outside Tier 1 is subject to standard Act 250 jurisdiction.

### Chapter 6: Economic Development

| Source | Recommendation / Comment                                                                                                                                                                                                 | ACRPC Response / Notes                          |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| LURB   | Consider revising the Economic Development chapter (Chapter 6) to incorporate throughout the chapter as relevant the economic development vision and implementation plan presented in the Economic Development Appendix. | Text has been added to address this suggestion. |
| LURB   | Consider more description of existing regional employment sectors and projected needs by sector.                                                                                                                         | Text has been added to address this suggestion. |
| LURB   | Consider more clearly identifying ACEDC's role in the economic development objectives and                                                                                                                                | Text has been added to address this suggestion. |

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|      | actions detailed in the Economic Development Chapter and Appendix.                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                       |
| LURB | Consider revising the Economic Development Chapter to describe how the CEDS relates to goals, objectives, and actions presented at the end of the chapter and in the Economic Development Appendix.                                                                                                                                    | Text has been added to address this suggestion.                                                                                                                                                       |
| LURB | Remove editorial comments from pages 3 and 4 of the Economic Development Appendix.                                                                                                                                                                                                                                                     | The correction has been made as suggested.                                                                                                                                                            |
| LURB | The job analytics in Figure 5 on page 5 of the Economic Development chapter are taken from UVM data and appear to be county specific; however, this should be clarified in the figure itself and not just in the figure data sources at the end of the chapter.                                                                        | The correction has been made as suggested.                                                                                                                                                            |
| LURB | Consider revising the education section in the Economic Development Chapter to reference higher educational institutions and opportunities within the county.                                                                                                                                                                          | Please see the community infrastructure chapter for additional information on higher education.                                                                                                       |
| LURB | Chapter 6, page 2: the second paragraph under education is redundant to discussions in the Community Infrastructure chapter. Consolidate by incorporating the paragraph on page 2 into the discussion on pages 34–35 of Chapter 4.                                                                                                     | Chapter 6 was developed in partnership with ACEDC to coordinate with the CEDS. Therefore, some review of contents in other chapters have been allowed to remain to honor the document as agreed upon. |
| LURB | The Chapter 6 subsection on infrastructure is largely a repeat of information presented in other chapters of the plan. To shorten the plan, reference the relevant chapter rather than repeating information in Chapter 6, or consolidate the information in the other chapter if it is new information (e.g., the paragraph on TENS). | ACRPC declines to make the suggested change.                                                                                                                                                          |

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| Public | Resident from Weybridge noted that she felt that p.12 of Chapter 6 called for more communal spaces. She felt this call for communal space should be included as a thread throughout the entire plan and included in other sections. | While ACRPC did not choose to utilize the concept of communal spaces as a throughline of the plan, they are discussed throughout the plan. In particular, Chapter 1, Natural Resources and Chapter 4, Community Facilities chapters talk at length on the importance and planning needed to encourage the development and maintenance of shared spaces for recreation, cultural activities, and social connection. |
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### Summary of Substantive Changes from Draft to Final

1. Text has been added to the main chapter (page 1) and the appendix (page 1) to better articulate the relationship between the RPC and ACEDC, as well as the relationship between the Regional Plan Chapter 6 and the West Central Vermont Comprehensive Economic Development Strategy.

### Chapter 7: Flood Resilience

| Source | Recommendation / Comment                                                                                                                                                    | ACRPC Response / Notes                                                                                                             |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| LURB   | Emergency Management is detailed within the Flood Resilience Chapter. Table 1 lists major declarations. Adding total costs to this chart would make it even more impactful. | ACRPC does not currently have this information for declarations since 2011 and is therefore unable to comply with this suggestion. |

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| LURB | Four municipalities that have river corridor regulations are noted but the two communities that have qualified for the highest ERAF level are not specified and should be provided this recognition.                                                                                                                                                                                  | Text has been added to address this suggestion. |
| LURB | Topographically defined floodplains are difficult to interpret on Map 2 on page 10 of Chapter 7. Consider revising the map and including explanatory text within the chapter. Acknowledge that the 100-year flood is what defines the Special Flood Hazard Area. Acknowledge that the 500-year flood is a more frequent occurrence. Discuss the relationship between Map 2 and Map 3. | Text has been added to address this suggestion. |

### Summary of Substantive Changes from Draft to Final

1. In response to comments from the LURB new text has been added to this chapter to expand the discussion on Special Flood Hazard Areas on page 5.
2. In response to comments from the LURB new text has been added to briefly discuss strategies to mitigate flood risk to historic structures on page 7.

### Chapter 8: Future Land Use

| Source | Recommendation / Comment                                                                                                                                                                                                                         | ACRPC Response / Notes                                                                                                        |
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| LURB   | Roads are not mapped on the FLU map. Map roads using an adjacent FLU category.                                                                                                                                                                   | This was added to methodology after ACRPC submitted the first draft to the LURB. The corrections have been made as suggested. |
| LURB   | Surface waters are not mapped. Map surface waters. The FLU digital data layer should include the full extent of the region. These could be mapped as "surface waters," Rural – Conservation, Resource-based Recreation, or another FLU category. | This was added to methodology after ACRPC submitted the first draft to the LURB. The corrections have                         |

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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | been made as suggested.                                                                                                                                                                                                                                                           |
| LURB | The explanation of the previous designation program and new designations as conferred by the LURB upon approval of the FLU map is not clear. These sections of Chapter 8 should be rewritten to divorce the Act 250 Tiers from the FLU areas discussion. Also, the relationship between the old designation program and the new program as established by Act 181 needs clearer treatment.                                                                                                                                 | Improvements to the text have been made to better distinguish these topics.                                                                                                                                                                                                       |
| LURB | On pages 5 and 7 there is a discussion of Act 250 jurisdictional tiers. Although Tier 1A and 1B have implications for Act 250 jurisdiction and are related to four of the future land use categories, the other six future land use categories are unrelated to Act 250 jurisdictional tiers. Given general public confusion about the relationship between FLUA categories and Act 250 jurisdiction, consider relocating this discussion or clarifying the lack of regulatory implications for the non-growth area FLUAs. | Due to recent changes in Act 181 requirements, discussion of Tiers have been largely removed from the plan, improving readability of this section.                                                                                                                                |
| LURB | On page 12, Rural General is identified as comprising 4.53% of the region and proposed to accommodate 40% of the region's proposed housing growth, while growth areas comprise 3.3% and are proposed to accommodate 60% of housing targets. Consider more explanation of how just 4.53% of the region will be able to accommodate 40% of regional housing targets in the form of low-density residential development.                                                                                                      | The total area of rural general has been revised to comprise 12.82% of the region and additional language has been added explaining how this area, in conjunction with rural ag/forestry areas, will accommodate a substantial majority of growth anticipated in the Rural Areas. |
| LURB | The Land Use Chapter indicates that growth areas will accommodate 60% of the regional housing targets. However, the RPC Checklist (Exhibit 016, p. 29) identifies that 80% of housing growth is planned for Downtown and Village Centers, Planned Growth Areas, and Village Areas, and 20% for the remaining                                                                                                                                                                                                               | The targets listed in the plan were correct. The RPC Checklist has been revised.                                                                                                                                                                                                  |

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|      | FLUAs except Rural Conservation (0%). Revise the documents to provide a consistent message.                                                                                                                                                                                                                               |                                                                                                                                                                |
| LURB | Consider including a summary of percent total in each FLU category, including surface waters if using that mapping category.                                                                                                                                                                                              | ACRPC declines to make this change to the regional plan. However, this data is available on our website under Act 181.                                         |
| LURB | Consider displaying Map 1 (Land Cover) from Chapter 8 on a single page.                                                                                                                                                                                                                                                   | Change has been made as recommended.                                                                                                                           |
| LURB | The second paragraph on page 5 of Chapter 8 refers to Map 1, but the reference should be to Map 2. Correct this.                                                                                                                                                                                                          | Map 1 presents current land use and is therefore the correct reference for the text identified.                                                                |
| LURB | Pages 5 & 7 mix Act 250 jurisdictional tiers with areas not eligible for Tier 1, which is confusing. Tier 2 could include villages and village areas, as well as planned growth areas and downtowns if a municipality does not opt in. The 6 non-growth area FLU areas do not have implications for Act 250 jurisdiction. | Recent changes to Act 181 requirements have resulted in revisions to Tier discussions throughout the Plan. ACRPC has striven to improve clarity on this issue. |
| LURB | Table 1 in Chapter 8 summarizes changes involving previously designated centers and NDAs — why not include proposed village areas in this table?                                                                                                                                                                          | ACRPC chose to focus on village center changes and not land use areas                                                                                          |
| LURB | Rural general mapping includes some relatively small parcels or areas that are disconnected from other nearby rural general areas. Adjust mapping to improve connectivity and reduce this effect.                                                                                                                         | FLUA mapping has been updated to comply with required corrections and meet the needs expressed by the community                                                |

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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | throughout our public process.                                                                                                                                                                      |
| ANR | General comment for Downtown Centers, Village Centers, Planned Growth Areas and Village Areas: The Champlain Valley is a known hotspot for biodiversity and threatened and endangered species. A number of the designated areas contain occurrences of T&E species. The Agency requests developers and municipalities reach out to the Agency's Fish and Wildlife Department during early planning stages if there are known T&E species occurrences on or near a project parcel. | ACRPC mapped these areas following the Statewide FLU methodology which states that protected natural resources may be included in this FLU area.                                                    |
| AOT | Rail sidings, spurs, and stations should be categorized with the 'Enterprise' Future Land Use designation. The Agency would recommend that ACRPC amend the FLUA map to reflect this and would be happy to coordinate with Addison to ensure areas are mapped accordingly.                                                                                                                                                                                                         | ACRPC met with VTrans to manually map VTrans' preferred FLU designation for all rail sidings, spurs, and stations in the ACRPC region.                                                              |
| AOT | Middlebury's Airport parcel should be designated 'Enterprise' with the designation snapping to parcel boundaries. Basin Harbor airport is designated as Resource Based Recreation; the Agency concurs with ACRPC's land use designation for Basin Harbor.                                                                                                                                                                                                                         | The Enterprise District follows current boundaries of Middlebury's Airport Zoning District to support the community's desire to resist increased development tensions, especially at the south end. |

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| VNRC | <p>Centers do not appear to fully comply with statutory definitions and criteria:</p> <p>(1) Proposed expansions of legacy DCs in Bristol and Vergennes incorporate residential neighborhoods, including previously designated NDAs in Vergennes, which may not meet the statutory definition of a 'center'.</p> <p>(2) Three Village Centers — Jerusalem (2.4 ac), Goshen (4.1 ac), and Panton (4.7 ac) — are so small that under current zoning they will accommodate little additional higher density development. Some expansion into surrounding Village Areas may be justified.</p> <p>(3) Several new or expanded VCs incorporate undeveloped agricultural, commercial, or low-density residential areas not consistent with higher density mixed-use: Bridport VC, E. Middlebury, Ferrisburgh VC, New Haven VC, Orwell VC, Shoreham VC, Weybridge VC.</p> | <p>(1) Legacy DCs in Bristol and Vergennes were expanded to include adjoining historical districts, as required by the mapping methodology.</p> <p>(2) These village centers were expanded to the extent that town leadership and the underlying zoning would allow.</p> <p>(3) These areas were mapped according to the methodology, which allows for the inclusion of some limited agricultural areas, commercial areas, or low density areas depending on other factors such as zoning, existing designations, and proximity.</p> |
| VNRC | <p>Several Village Areas (VAs) and Planned Growth Areas (PGAs) do not appear to comply with the statutory 'within walking distance' requirement:</p> <ul style="list-style-type: none"> <li>• Ferrisburgh PGA, north of Vergennes (1.5 mi from center)</li> <li>• Panton PGA, east of Vergennes (1.3 mi)</li> <li>• Ripton VA, north of Ripton Village (2.0 mi)</li> <li>• Shoreham VA, north and east of Shoreham Village (1.3 mi)</li> <li>• Waltham PGA, south and east of Vergennes (1.5</li> </ul>                                                                                                                                                                                                                                                                                                                                                           | <p>These areas were mapped according to the statewide methodology. In particular, mapping process VC (5)(f)<sup>1</sup> influenced the expansion of these VCs due to the unique context of each town</p>                                                                                                                                                                                                                                                                                                                             |

<sup>1</sup> Village Center methodology (5)(f): Verify the area is large enough to provide for infill development or new development areas consistent with the housing targets where the municipality can grow and be flood resilient. If the area is not large enough, consider additional area that could or should be included.

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|        | <p>mi)</p> <p>Several areas proposed for PGA or VA designation are also overly expansive, include low-density residential and/or farm and forest land, and do not meet smart growth principles.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>that otherwise limited their ability to meet housing goals.</p>                                                                                                                                                                                                           |
| VNRC   | <p>Tier 1B Status concerns:</p> <p>(1) Six mapped village centers do not include a portion of a state or national register historic district as currently required for Tier 1B status: Addison VC, Ferrisburgh VC, Goshen VC, Leicester VC, Jerusalem VC (Starksboro), Whiting VC.</p> <p>(2) Several proposed Tier 1B areas incorporate mapped flood hazard areas and river corridors. No information was available specific to NFIP participation or flood/river corridor regulation status for: Bridport VA, Bristol PGA, East Middlebury VC, Goshen VA, Jerusalem VA, Leicester VA, Lincoln VC/VA, Middlebury DC/PGA, Ripton VC, Salisbury VC/VA, Starksboro VA, Vergennes DC/PGA, Whiting VC.</p> | <p>FLUA map has been updated to ensure municipal FLUA mapping treatment properly responds to the provided methodology in regard to historic districts, river corridors and flood hazard areas.</p>                                                                           |
| Public | <p>Monkton resident notes that the Rural Conservation FLU boundary appears to arbitrarily include nearly 8 acres of their parcel on Hardscrabble Road, adjacent to Monkton Town Forest. Questions raised: What legal recourse exists to contest the boundary between conservation and rural designations? Would a local DRB have 'wiggle room' on a given application? Was consideration made for how boundaries were created? Is there evidence-based science behind the designations?</p>                                                                                                                                                                                                            | <p>Rural conservation areas were mapped according to the statewide methodology. This particular area contains highest priority forest and connectivity blocks, which are part of the criteria for rural conservation areas. The FLU map does not influence local zoning.</p> |
| Public | <p>Resident from Addison noted that his property is listed as conservation, but that he has not conserved his property and that he still pays taxes on it at its</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Rural conservation areas were mapped according to the</p>                                                                                                                                                                                                                 |

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|  | highest and best use and that this designation is an arbitrary and capricious taking of his rights. | statewide methodology. After reviewing the methodology and the resident's concerns ACRPC amended the map to make these parcels Rural general, similar to several neighboring parcels. |
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### Summary of Substantive Changes from Draft to Final

1. References to Tier 3 as well as the Road Rule related to Act 181 (2024) have been eliminated because they are no longer in statute. References to Tier 2 have been updated to reflect that all land outside Tier 1 is subject to standard Act 250 jurisdiction. The area in Panton previously classified as a Planned Growth Area was changed to Rural General in response to feedback from the LURB.
2. In response to comments from the Agency of Natural Resources the Regional Future Land Use Map has been updated to incorporate the National Wetlands Inventory Maps which provide new data for some of the Region.
3. In response to comments from the LURB the FLUA map has been updated in accordance with mapping methodology released following the initial submission of the Regional Plan. These changes include mapping of roads and surface waters in the FLUA map and appropriate categorization of these areas.
4. In response to comments from the LURB the FLUA map has been updated to ensure municipal FLUA mapping treatment properly responds to the provided methodology in regard to river corridors and flood hazard areas.
5. The Future Land Use Map in the Plan, which was approved by the ACRPC Full Commission on September 9, 2026, depicts Village Areas and Planned Growth Areas in six communities that have expired municipal plans. Vermont State Statute requires current municipal plans to be in effect in order to designate Village Area and Planned Growth Area land use categories. An amendment to the Future Land Use map modified the Village Areas and Planned Growth Areas in municipalities without current municipal plans to Special Use Areas anticipating Future Village Areas and Planned Growth Areas upon adoption and confirmation of municipal plans in those communities. Supporting edits explaining the map change and

adding a Special Land Use Area was made to Chapter 8: Future Land Use of the Regional Plan.

## **Chapter 9: Compatibility**

*No comments or substantive changes made to this chapter.*

## **Chapter 10: Equity, Burdens and Benefits**

| Source | Recommendation / Comment                                                                                                                                                                                                                                            | ACRPC Response / Notes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| Public | Resident from Weybridge noted that Chapter 10, p. 1 dealing with equity included a definition of “Economic Justice populations”. She suggested that the definition should also be woven into the Economic Development section. She will send Adam specific changes. | No written suggestions were received following the public hearing. ACRPC has investigated indicators of economic justice in response to this comment for inclusion in the plan. Unfortunately, staff were not able to find an indicator that is presented at an appropriate geographic scale or time interval for effective use at the Regional level. ACRPC has chosen to retain the work completed in partnership with ACEDC to write the Economic Development Chapter and refrain from making this change. |

## **Summary of Substantive Changes from Draft to Final**

1. References in this chapter to goals, objectives and actions in previous chapters has been updated to reflect changes made in those chapters during the public hearing process.