



Preapplication Review Comments

Regional Planning Commission: Central Vermont - RPC03

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Partner Agency: Agency of Natural Resources

Natural Resources Goal and Element

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

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

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

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

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

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

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

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

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

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

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

Flood Resilience Goal and Element

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

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

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