

From: [Stephen Whitaker](#)
To: [Christian Meyer](#)
Cc: [atpeal](#); [Dingledine, Brooke](#); [Act250 - Board](#); asap.centralvermont@gmail.com
Subject: Notice regarding the § 4348(d)(1) written description of Regional Future Land Use Map changes — Docket RPC03-0001
Date: Wednesday, August 12, 2026 11:34:45 AM

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Date: August 12, 2026

To: Christian Meyer, Executive Director, Central Vermont Regional Planning Commission

Cc: Alice Peal, Regional Plan Committee Chair; Brooke Dingledine, Land Use Review Board; Act250.Board@vermont.gov

From: Stephen Whitaker, ASAP4CV, Montpelier, Vermont

Re: Notice regarding the § 4348(d)(1) written description of Regional Future Land Use Map changes — Docket RPC03-0001

Dear Christian,

This letter puts on record a specific gap in the materials CVRPC emailed on August 10, 2026, and gives CVRPC advance notice — consistent with the timeline CVRPC itself has announced — of the opportunity to address it before the § 4348(d)(1) delivery deadline that framing implies.

The gap

24 V.S.A. § 4348(d)(1) requires that the materials delivered to the statutory notice list include “a description of any changes to the Regional Future Land Use Map.” The document CVRPC circulated for this purpose — the August 6, 2026 “Future Land Use Areas Map Change Memo” — contains, for the Montpelier entry, a single sentence of substantive justification for the Planned Growth Area designation: that the area “largely aligns with the legacy State Designated Growth Center Boundary.” No criterion-by-criterion basis is offered, for Montpelier or for any other municipality in the memo’s Table 2. A description limited to legacy-boundary adjacency does not describe what changed and why in terms the statute’s own criteria supply — it describes only that the boundary is similar to a boundary that predates the current statutory framework entirely.

That characterization is also imprecise on its own terms. Montpelier’s legacy Growth Center boundary, per the State’s own Planning Atlas, is 1,054.93 acres. Measuring directly from the City Planning Commission’s own submitted map

(Exhibit 034), the proposed Downtown Center and Planned Growth Area designations together cover approximately 2,279 acres in solid designation alone — before counting the City’s own additional hatched requests for Country Club Road, Crestview, the “boney pasture,” and Westwood Drive, which would increase that total further. That is roughly 2.2 times the legacy boundary the memo says the new designation “largely aligns with.” A change of this magnitude is not adequately described by a single sentence invoking similarity to a boundary more than twice the proposed area’s size.

I want to be transparent about how I arrived at that figure, because the process itself illustrates the problem this letter raises. I could not find the current proposed Planned Growth Area acreage stated as a single, clear number anywhere in CVRPC’s or the City’s materials — not in the August 6 memo, not in meeting transcripts, not in the docket exhibits. I was only able to approximate it by measuring pixel areas directly from a submitted map graphic and calibrating against its printed scale bar. Residents and interested parties should not have to reconstruct a basic fact about a proposed land use change of this scale from a ruler held up to a PDF. That is precisely the kind of description § 4348(d)(1) exists to require CVRPC to provide in the first instance.

I do not raise this as a comment on the competence of any individual. Producing a genuine, criterion-based narrative for every proposed Planned Growth Area boundary across 23 municipalities, on the timeline this docket has been operating under, is a substantial undertaking. It is, however, exactly what § 4348(d)(1) calls for, and exactly what the interested parties and member municipalities entitled to that notice are owed.

Timing

CVRPC’s own August 10, 2026 hearing notice states that September 14, 2026 is “the first of two statutorily required public hearings” on the Regional Plan. Under that framing, § 4348(d)(1)’s requirement that this material be delivered “at least 30 days prior to the first hearing” places the deadline for a complete, corrected description at August 15, 2026 — three days from the date of this letter.

This letter is intended to give CVRPC clear notice of the gap while that opportunity still exists, so that any correction (or the absence of one) is made with full awareness of the deadline CVRPC itself has announced, rather than after the fact.

A constructive suggestion, offered for the record

I raised, in earlier ADA and accessibility comments in this docket, the idea of per-parcel attribute data — met, not met, or not evaluated, against each of the seven § 4348a(a)(12)(B) criteria — being carried as a structured layer on the Future Land Use Map itself. I want to note here a related, practical possibility: once that attribute data exists in structured form, a well-scoped AI agent could generate a genuine, criterion-based narrative description directly from it, parcel by parcel, at a fraction of the staff time a manually drafted narrative would require. Mr. Voigt and CVRPC GIS staff completing the underlying attribute work is the harder and more important half of that task; generating readable narrative text from completed structured data is comparatively mechanical.

If CVRPC has any interest in this approach, either for this docket or for future plan cycles, I would be glad to discuss it further — including the possibility of jointly approaching Esri regarding agent-accessible APIs for ArcGIS Online, so that this kind of narrative generation could be done directly from the authoritative GIS data rather than as a separate manual exercise. I offer this in the spirit of a genuine process improvement, not as a precondition for anything requested above.

I note, though, that this improvement could not realistically be built and deployed by August 15. That timing gap is itself worth naming plainly, because it describes a bind rather than a simple delay. A genuine, criterion-based narrative for every proposed designation, done properly, takes real time — more time than remains before the current hearing schedule. CVRPC's choices from here are limited: complete that work properly and push the hearing schedule further into September or beyond, which increases pressure to treat the eventual product as settled without full review once it finally appears; or hold the current schedule and let the description remain as thin as the August 6 memo, produced under the same time pressure that produced it the first time. Either path compresses the public's actual opportunity to review and respond, and neither is a fault of any individual — it is a structural consequence of asking for both real work and a fixed date at the same time. I raise this not to suggest CVRPC delay adoption, but so the Board and the public understand why a rushed correction, if one appears by August 15, may itself warrant scrutiny rather than automatic acceptance as curing the gap.

Requested actions

- Confirm whether the August 6, 2026 memo constitutes CVRPC's complete § 4348(d)(1) description of Regional Future Land Use Map changes, or whether a corrected or completed version is forthcoming.

- If a corrected version is forthcoming, deliver it to the full § 4348(d)(1) notice list by August 15, 2026, consistent with the 30-day timeline CVRPC's own August 10 hearing notice establishes — and if that timeline cannot accommodate a genuine, criterion-based narrative, state that plainly and address the hearing schedule accordingly, rather than delivering a description that repeats the August 6 memo's level of generality under the same time pressure.
- Consider, for this cycle or future ones, structuring the per-parcel FLUM attribute layer so that criterion-based narrative descriptions can be generated efficiently and accurately from it — including possible joint outreach to Esri regarding agent-accessible ArcGIS Online APIs for that purpose.

Thank you for your attention to this matter.

Sincerely,

Stephen Whitaker

ASAP4CV, Montpelier, Vermont