VERMONT
LAND USE REVIEW BOARD
Application #: RPC03-0001
Exhibit #: 080
Date Received: 11-01-2026

Objection Form – Application for Board Affirmative Determination of an Adopted Regional Plan

Instructions: An interested party who meets the requirements of 24 V.S.A. § 4348(i)(1) and (2) may object to the application for an affirmative determination of an adopted regional plan. To be considered, the Board must receive this form within 15 days of the adoption of the regional plan at issue. Submit this form to the Land Use Review Board via email – act250.board@vermont.gov. The scope of your objection(s) is whether the regional plan is **consistent with** the regional plan elements and future land use areas as described in 24 V.S.A. § 4348a.

Section 1 of this form **must** be completed. The remainder of the form may be completed fully or in part. If you have no comments under the given section, leave that section blank.

Section 1: Interested Party Information

1. What Regional Planning Commission you are objecting to.

- ○ Addison County – RPC01
- ○ Bennington County – RPC02
- ◉ Central Vermont – RPC03
- ○ Chittenden County – RPC04
- ○ Lamoille County – RPC05
- ○ Mount Ascutney – RPC06
- ○ Northeastern Vermont Development Association – RPC07
- ○ Northwest – RPC08
- ○ Rutland – RPC09
- ○ Two-Rivers Ottauquechee – RPC10
- ○ Windham – RPC11

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2. Name

   Ken Denton, for Cabot resident petitioners

3. Email address

   cabot.hills.maple@gmail.com

4. Physical address

   975 Thistle Hill Rd, Cabot,VT

5. Interested Party Type: to submit an objection form, you must meet one of the following. Please check one, answer all follow-up questions, and/or send information

☐ The chair of the legislative body, or municipal manager, if any, of each municipality within the region;

If yes, please list municipality and title.

☐ The executive director of an abutting regional planning commission;

If yes, please list the abutting regional planning commission.

☐ Department of Housing and Community Development

☐ Community Investment Board

☐ A business, conservation, low-income advocacy, and other community or interest groups or organizations, which have requested notice in writing prior to the date the hearing is warned

☐ Agency of Natural Resources

☐ Agency of Agriculture, Food and Markets

☐ Agency of Transportation

☐ Department of Public Service

☐ Department of Public Safety's Division of Emergency Management

☑ Any 20 (or more) persons by signed petition who own property or reside within the region? Send the petition along with this form to act250.board@vermont.gov

If yes, name of designated representative:

Ken Denton, 975 Thistle Hill Rd, Cabot, VT

Describe how the designated representative participated in the regional plan adoption process?

Ken Denton took part in the CVRPC adoption process by speaking at the CVRPC Board of Commissioners Meeting 9/8/26 in Montpelier, Public Q&A 10/15/26, submitted written responses and voicemail to plan, noted in Regional Plan Public Comments on 9/8/26, also requested category breakdown by percentages for future land use maps. The signed petition of 69 Cabot and CVR residents and property owners is attached.

Section 2 – Required Elements of a Regional Plan

The regional plan must include the following elements. 24 V.S.A. § 4348a(a). Does the adopted regional plan contain:

1. A statement of basic policies of the region to guide the future growth and development of land and of public services and facilities, and to protect the environment. 24 V.S.A. § 4348a(a)(1).

We are Cabot residents and property owners. The plan's basic policies do nothing to protect our property rights, even though the land use map now has legal weight: CVRPC has said the approved plan will be used in Act 250 and Section 248 reviews. State law (24 V.S.A. 4302(a)) requires care to protect our constitutional right to acquire, own and protect property. A category on this map can change what we may do with land our families have farmed or logged for generations, and what that land is worth. Most of us were never told our land had been mapped or reclassified.

Requested change: add a basic policy that land use designations affecting private land be reviewed with direct notice to the owners and a real chance to respond. Treat Cabot's designations as provisional until that happens.

2. A natural resources and working lands element, which shall consist of a map or maps and policies, based on ecosystem function, consistent with Vermont Conservation Design, support compact centers surrounded by rural and working lands, and that:

(A) Indicates those areas of significant natural resources, including existing and proposed for forests, wetlands, vernal pools, rare and irreplaceable natural areas, floodplains, river corridors, recreation, agriculture using the agricultural lands identification process established in 6 V.S.A. § 8, residence, commerce, industry, public, and semipublic uses, open spaces, areas reserved for flood plain, forest blocks, habitat connectors, recreation areas and recreational trails, and areas identified by the State, regional planning commissions, or municipalities that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes.

(B) Indicates those areas that have the potential to sustain agriculture and recommendations for maintaining them that may include transfer of development rights, acquisition of development rights, or farmer assistance programs.

(C) Indicates those areas that are important as forest blocks and habitat connectors and plans for land development in those areas to minimize forest fragmentation and promote the health, viability, and ecological function of forests. A plan may include specific policies to encourage the active management of those areas for wildlife habitat, water quality, timber production, recreation, or other values or functions identified by the regional planning commission.

(D) Encourages preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

(E) Encourages protection and improvement of the quality of waters of the State to be used in the development and furtherance of the applicable basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253.
24 V.S.A. § 4348a(a)(2).

3. An energy element, including an analysis of resources, needs, scarcities, costs, and problems within the region across all energy sectors, including electric, thermal, and transportation; a statement of policy on the conservation and efficient use of energy and the development and siting of renewable energy

resources; a statement of policy on patterns and densities of land use likely to result in conservation of energy; and an identification of potential areas for the development and siting of renewable energy resources and areas that are unsuitable for siting those resources or particular categories or sizes of those resources. 24 V.S.A. § 4348a(a)(3).

4. A transportation element consisting of a statement of present and prospective transportation and circulation facilities, and a map showing existing and proposed highways, including limited access highways, and streets by type and character of improvement, and where pertinent, anticipated points of congestion, parking facilities, transit routes, terminals, bicycle paths and trails, scenic roads, airports, railroads and port facilities, and other similar facilities or uses, and recommendations to meet future needs for such facilities, with indications of priorities of need, costs, and method of financing. 24 V.S.A. § 4348a(a)(4).

5. A utility and facility element, consisting of a map and statement of present and prospective local and regional community facilities and public utilities, whether publicly or privately owned, showing existing and proposed educational, recreational and other public sites, buildings and facilities, including public schools, State office buildings, hospitals, libraries, power generating plants and transmission lines, wireless telecommunications facilities and ancillary improvements, water supply, sewage disposal, refuse disposal, storm drainage, and other similar facilities and activities, and recommendations to meet future needs for those facilities, with indications of priority of need. 24 V.S.A. § 4348a(a)(5).

6. A program for the implementation of the regional plan's objectives, including a recommended investment strategy for regional facilities and services based on a capacity study of the elements in this section. 24 V.S.A. § 4348a(a)(7).

The plan's investment strategy is not based on a complete study. The plan lacks the finished analysis of benefits and burdens and its results tables, so we cannot tell whether infrastructure investment will reach Cabot or how the map will affect our neighborhoods. Our town's volunteer boards got no data or staff help from CVRPC to explain the plan to us.
Requested changes: (1) finish and publish all missing benefits-and-burdens tables and data; (2) provide plain-language summaries for residents of each town and staff help for volunteer town boards.

7. A statement indicating how the regional plan relates to development trends, needs, and plans and regional plans for adjacent municipalities and regions. 24 V.S.A. § 4348a(a).

The plan does not show how it relates to Cabot's own Town Plan, adopted March 4, 2025, which we and our neighbors helped shape. Where the regional map departs from our town plan, no one explained the difference to us. Our volunteer Selectboard had one meeting to consider the plan, and our Planning Commission had no time to compare the map with our town plan and zoning, parcel by parcel, or to explain it to residents. On October 13, 2026 the Selectboard asked CVRPC to postpone adoption for this reason.

Requested change: document how the regional plan relates to Cabot's Town Plan, and give Cabot residents a plain summary of how the plan and map affect our town before Cabot's designations become final.

8. A housing element that identifies the regional and community-level need for housing that will result in an adequate supply of building code and energy code compliant homes where most households spend not more than 30 percent of their income on housing and not more than 15 percent on transportation. To establish housing needs, the Department of Housing and Community Development shall publish statewide and regional housing targets or ranges as part of the Statewide Housing Needs Assessment. The regional planning commission shall consult the Statewide Housing Needs Assessment; current and expected demographic data; the current location, quality, types, and cost of housing; other local studies related to housing needs; and data gathered pursuant to subsection 4382(c) of this title. If no such data has been gathered, the regional planning commission shall gather it. The regional planning

commission’s assessment shall estimate the total needed housing investments in terms of price, quality, unit size or type, and zoning district as applicable and shall disaggregate regional housing targets or ranges by municipality. The housing element shall include a set of recommended actions to satisfy the established needs. 24 V.S.A. § 4348a(a)(9).

The plan sets housing targets for Cabot that residents were never consulted on. The draft arrived about 30 days before the first hearing, and no hearing was held in Cabot.

Requested change: label Cabot's housing targets preliminary, subject to a 2027 review with a hearing in or near Cabot and at least 90 days for comment.

9. An economic development element that describes present economic conditions and the location, type, and scale of desired economic development, and identifies policies, projects, and programs necessary to foster economic growth. 24 V.S.A. § 4348a(a)(10).

The economic development element does not look at how the land use designations, and the rules tied to them now and later, may affect our land values, what we can do with our land, our property taxes, and the finances of Cabot families. Once published, a designation is public record. Buyers, lenders and assessors may see our land as worth less because of rules no one knows yet. Without that study, compared against each town's current economic situation, the element cannot show that the plan's benefits (Tier 1 Act 250 relief, State investment, housing and infrastructure money) reach rural towns like Cabot fairly.

Requested change: complete and publish an economic study of the designations, town by town, before Cabot's designations are treated as final.

10. Flood Resilience Element

(A) A flood resilience element that:

(i) identifies flood hazard and fluvial erosion hazard areas, based on river corridor maps provided by the Secretary of Natural Resources pursuant to 10 V.S.A. § 1428(a) or maps recommended by the Secretary, and designates those areas to be protected, including floodplains, river corridors, land adjacent to streams, wetlands, and upland forests, to reduce the risk of flood damage to infrastructure and improved property; and

(ii) recommends policies and strategies to protect the areas identified and designated under this subdivision (A) and to mitigate risks to public safety, critical infrastructure, historic structures, and public investments.

(B) A flood resilience element may reference an existing regional hazard mitigation plan approved under 44 C.F.R. § 201.6. See 24 V.S.A. § 4348a(a)(11).

Section 3 – Future Land Use Element

The regional plan must include

A future land use element, based upon the elements in this section, that sets forth the present and prospective location, amount, intensity, and character of such land uses in relation to the provision of necessary community facilities and services and that consists of a map delineating future land use area boundaries for the land uses in subdivisions (A)–(J) of this subdivision (12) as appropriate and any other special land use category the regional planning commission deems necessary; descriptions of intended future land uses; and policies intended to support the implementation of the future land use element using the land use categories as defined by 24 V.S.A. § 4348a(a)(12).

Below please provide any general comments you have on the future land use categories or mapping:

CVRPC spent years revising this plan; we had 30 days to review a 416-page plan with maps and charts that will shape our land for eight years. The land use chapter and map are the newest and most important part of it for property owners: under Act 181 they help decide where and how Act 250 applies. Cabot's map was redrawn this summer after Act 152 changed the categories, and no redline was ever shared. The 2024 plan ran 286 pages. The three public hearings were poorly advertised and held in Montpelier, none in Cabot, and owners whose parcels were reclassified were not notified.
Future Land Use categories are applied to the whole parcel and does not allow multiple categories on a single parcel.

Requested change: treat Cabot's designations as provisional; hold working sessions in Cabot with direct notice to owners; publish a redline of Cabot's map and the share of land in each category, by town, on the map itself; and reopen comment for at least 90 days, without costing Cabot its planning grants, designation benefits or Act 250 housing exemptions.
Review assigned property categories with landowners and allow multiple land use categories on a single parcel.

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The twelve land use categories are listed below. Please provide any comments you have regarding specific land use categories. When possible, please list the specific geographic location (i.e. town name)

Downtown Center - The traditional and historic central business and civic centers within planned growth areas, village areas, or may stand alone. 24 V.S.A § 4348a(12)(A).

Village Center - The traditional and historic central business and civic centers within planned growth areas, village areas, or may stand alone. Village centers are not required to have public water, wastewater, zoning or subdivision bylaws. 24 V.S.A § 4348a(12)(A).

Planned Growth Area - These areas include the high-density existing settlement and future growth areas with high concentrations of population, housing, and employment in each region and town, as appropriate. They include a mix of historic and nonhistoric commercial, residential, and civic or cultural sites with active streetscapes, supported by land development regulations; public water or wastewater, or both; and multimodal transportation systems. *See* 24 V.S.A § 4348a(12)(B).

Village Area - These areas include the traditional settlement area or a proposed new settlement area, typically composed of a cohesive mix of residential, civic, religious, commercial, and mixed-use buildings, arranged along a main street and intersecting streets that are within walking distance for residents who live within and surrounding the core. These areas include existing village center designations and similar areas statewide, but this area is larger than the village center designation. 24 V.S.A § 4348a(12)(C).



Transition or Infill Area - These areas include areas of existing or planned commercial, office, mixed-use development, or residential uses either adjacent to a planned growth or village area or a new stand-alone transition or infill area and served by, or planned for, public water or wastewater, or both. The intent of this land use category is to transform these areas into higher-density, mixed-use settlements, or residential neighborhoods through infill and redevelopment or new development. New commercial linear strip development is not allowed as to prevent it negatively impacting the economic vitality of commercial areas in the adjacent or nearby planned growth or village area. This area could also include adjacent greenfields safer from flooding and planned for future growth. 24 V.S.A § 4348a(12)(D).



Resource-Based Recreation Area - These areas include large-scale resource-based recreational facilities, often concentrated around ski resorts, lakeshores, or concentrated trail networks, that may provide infrastructure, jobs, or housing to support recreational activities. 24 V.S.A § 4348a(12)(E).

Enterprise Area - These areas include locations of high economic activity and employment that are not adjacent to planned growth areas. These include industrial parks, areas of natural resource extraction, or other commercial uses that involve larger land areas. Enterprise areas typically have ready access to water supply, sewage disposal, electricity, and freight transportation networks. 24 V.S.A § 4348a(12)(F).

Hamlets - Small historic clusters of homes and may include a school, place of worship, store, or other public buildings not planned for significant growth; no public water supply or wastewater systems; and mostly focused along one or two roads. These may be depicted as points on the future land use map. 24 V.S.A. § 4348a(12)(G).

Rural; General - These areas include areas that promote the preservation of Vermont's traditional working landscape and natural area features. They allow for low-density residential and some limited commercial development that is compatible with productive lands and natural areas. This may also include an area that a municipality is planning to make more rural than it is currently. 24 V.S.A § 4348a(12)(H).

Cabot owners: our rural land should stay under Cabot's current zoning, or in the least restrictive rural category, until a 2027 review. The map was redrawn this summer after Act 152 (signed June 16, 2026) redefined these categories, and owners were not told what changed. All our land is categorized Rural Forestry and Agriculture. A portion of same should/could be allowed to be classified and mapped Rural General, which would allow additional opportunities on our land if desired.
See our comments under Rural; Agriculture and Forestry and Rural; Conservation.

Rural; Agriculture and Forestry - These areas include blocks of forest or farmland that sustain resource industries, provide critical wildlife habitat and movement, outdoor recreation, flood storage, aquifer recharge, and scenic beauty, and contribute to economic well-being and quality of life. Development in these areas should be carefully managed to promote the working landscape and rural economy, and address regional goals, while protecting the agricultural and forest resource value. 24 V.S.A § 4348a(12)(I).

Cabot owners: this is the designation that worries us most, because of how it may be used and imposed on our land. The rules that will apply to it are not yet written; some land use restrictions are not expected until 2028. Owners deserve to know what this designation could mean before it is locked in, and 30 days gave no one that chance. The classifications were also drawn this summer around rules Act 152 repealed (Tier 3 and the road rule), and owners whose land was reclassified were not notified. While checking the petition at the Cabot Village Store this morning (10/31/26), a property owner on Cabot Plains stated that he had no idea this was happing and signed the petition.
Requested change: do not finalize this designation in Cabot until the rules tied to it are known; notify each affected owner directly, explain what the designation could mean for their land, correct the parcels listed, and revisit in 2027 after the Legislature's natural resources process ends.

Rural; Conservation - These are areas of significant natural resources, identified by regional planning commissions or municipalities based upon existing Agency of Natural Resources mapping that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes. The mapping of these areas and accompanying policies are intended to help meet requirements of 10 V.S.A. chapter 89. Any portion of this area that is approved by the LURB as having Tier 3 area status shall be identified on the future land use map as an overlay upon approval. 24 V.S.A § 4348a(12)(J).

Cabot owners: the conservation classifications were built around Tier 3, which Act 152 repealed and the Vermont Conservation Design Mapping. The FLU Map was drawn only this summer.

Requested change: leave Cabot's conservation classifications for the 2027 amendment, with direct notice to owners before any are finalized.