

Ascutney Mountain Audubon Society

P.O. Box 191
Springfield, Vermont 05156

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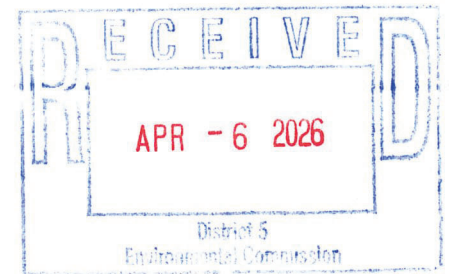
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March 13, 2026

Alex Weinhagen
Vermont Land Use Review Board
10 Baldwin Street
Montpelier, Vermont 05633-3201



RE: Comments on MARC's Draft 2026 Regional Plan

Dear Mr. Weinhagen:

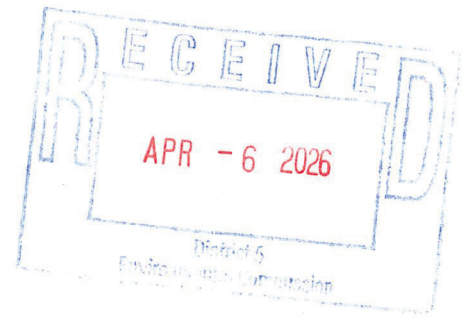
The Ascutney Mountain Audubon Society (AMAS) was established in 1972 and serves 18 communities in Vermont of which over half fall within the Mount Ascutney Regional Commission's (MARC) service area. We have a membership of 363 persons, and our mission statement is "To promote enjoyment, appreciation, and conservation of nature through education, habitat protection, and advocacy for the benefit of our communities and all living things."

We have reviewed MARC's draft 2026 Regional Plan, and while we have little to offer on a broad scale, one particular proposal of great concern is designating the former Windsor prison as a Village Area. As such, this designation along with Tier 1B status would enable high density development with a partial Act 250 exemption. AMAS views high density residential development of the remaining 60± acres of prison property to be incompatible with the surrounding state owned and managed Windsor Grasslands Wildlife Management Area (WMA). In 2017, the Vermont Department of Buildings and General Services transferred 826.5 acres of former prison farmlands, forests, and wetlands to the Vermont Department of Fish and Wildlife (FWD) thus establishing the WMA. The WMA is critical habitat to a large suite of wildlife, e.g. deer, bears, wild turkeys, ruffed grouse, woodcock and snipe, and many songbird species. Over the past 15 years 165 bird species (eBird data), including nesting and migratory species, have been observed on the WMA. Of these, 18 bird species (most documented as nesting on the WMA) are classified by the FWD as high (6 species) and medium (12 species) priority Species of Greatest Conservation Need in its 2015 Vermont Wildlife Action Plan.

The FWD has invested significant resources to manage critical habitats on the WMA including enhancing former hay fields to benefit grassland birds, controlling invasive plants, and planting native trees and shrubs beneficial to wildlife. AMAS has advocated for the establishment of the WMA since the former prison ceased farming operations in the 1990s and supports the FWD in its goal to implement best management practices on the property.

A Chapter of the National Audubon Society

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Designating the remaining prison property as a Village Area, when it is in such close proximity to the WMA, raises significant concerns that poorly planned or incompatible development of the site may lead to a variety of unintended impacts on the WMA's natural resources and the purposes for which it was established. The draft regional plan envisions developing nearly 100 residential units on the remaining prison land. Such high density development and corresponding permanent human presence is anticipated to have negative effects on wildlife, their habitats, and the public's enjoyment of the WMA.

1. The increased human presence resulting from Village Area designation and high density residential development in such proximity to the WMA has the potential to increase the incidence of unlawful activities (see [10 APPENDIX V.S.A. App. § 15](#)), such as off-road vehicle use, rogue trails for mountain biking, and other activities detrimental to wildlife and critical habitats.
2. Increased disturbance and depredation on wildlife from domestic pets. Free-ranging cats preying on grassland birds is a widely documented threat, and unleashed dogs roaming the WMA can cause mortality to ground nesting birds and other wildlife using the fields to raise their young.
3. Deer wintering areas occur immediately north and east of the proposed Village Area. Free-ranging dogs can impose excessive stress on deer during the critical winter season resulting in added deer mortality.
4. The WMA offers the public unique opportunities to explore and enjoy the property and nature whether engaging in birdwatching, hunting, or simply enjoying a quiet walk. Increased human activity, whether occurring on or adjacent to the WMA, will negatively affect the quality of these experiences. It is noteworthy that the proposed regional plan's description of Village Areas in no way conforms to the prison property (see pages 3-12 and 3-13).
5. Under Tier 1B Act 250 review it is unclear how much weight, if any, will be given to Criterion 8: Ecosystem protection, scenic beauty, historic sites.

Furthermore, the prison is 3.4 miles from town and in the middle of a very rural area. It is hardly appropriate to rezone the prison property as a Village Area as there are no nearby stores, amenities and support services. It's remoteness from downtown Windsor completely contradicts the state's goal to locating new housing in or near existing villages. Also, the proposed Village Area has no access to public transportation, thus occupants would need

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private vehicles resulting in a huge increase in traffic on very rural County Road not to mention adding to society's carbon footprint.

In conclusion, while AMAS recognizes there is a need in Vermont for high density affordable housing, there are locations where it is appropriate and areas where it is obviously not suited, such as adjacent to wildlife management areas and similar natural resource conservation lands. AMAS requests the LURB not approve of designating the prison property as a Village Area and that the greater area is best classified as Rural Conservation.

Sincerely yours,



Kenneth M. Cox, Chair
Ascutney Mountain Audubon Society

Cc: Mount Ascutney Regional Commission
c/o Jason Rasmussen
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Town of Windsor
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29 Union Street
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Vermont Fish and Wildlife Department
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100 Mineral Street, Suite 302
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