

August 11, 2026

TO: Land Use Review Board (LURB)
Department of Public Service (DPS)
FROM: Mount Ascutney Regional Commission (MARC)
SUBJECT: Summary of Substantive Changes to 2026 Regional Plan

Many changes were made to the MARC Regional Plan (as adopted on July 27, 2026) to address the Land Use Review Board's (LURB's) preapplication response, dated May 4, 2026, comments from the Department of Public Service (DPS), as well as other comments received as part of both the LURB preapplication review and MARC's first public hearing on May 26, 2026. This memorandum summarizes the changes made to the document in response to those comments. The changes are tracked on the preapplication version of the Regional Plan to make it easier for the LURB and DPS to see what changes have been made since the preapplication submission.

These changes were included in a revised draft that was presented at the second public hearing on July 27, 2026. At the regular meeting of the MARC Board of Commissioners directly following that hearing, the 2026 Regional Plan was adopted.

Note: the section numbers below refer to the labeling in the LURB's preapplication response letter, dated May 4, 2026 (e.g., A.3.2 refers to Section A. Furthering State Planning Goals, 3. Conformance with 24 V.S.A. § 4302(c), Goal 2 on page 3). We have also given each comment and response with sequential numbers as a reference (i.e., Comment 1 as C-1 and Response 1 as R-1).

Vermont Land Use Review Board Comments

A.3.2 Advisory recommendation regarding furthering the **State Planning Goal 2** [24 V.S.A. §4302]:

C-1 *"Table 10.3 details the percentage of households receiving cash assistance programs by municipality. Clarify if this is meant to be a proxy for identifying which communities in the region have high unemployment or low per capita incomes, and the extent to which the efforts to expand economic opportunities described in the Economic Development chapter include these communities."*

R-1 No changes were made. Table 10.3 is intended to provide additional context about economic vulnerability across the region rather than serve as a direct measure of unemployment or per capita income.

A.3.4 Advisory recommendation regarding furthering the **State Planning Goal 4** [24 V.S.A. §4302]:

C-2 *"As evidenced by the public participation section in the implementation section on pages 44-45 of volume 2, outreach efforts are more robust than indicated in the introduction. Consider referencing this*

later section in the introduction to clarify that public outreach goes beyond the four outreach methods noted on pages 2-3.”

R-2 In response, the Regional Plan was modified to better reflect these and other outreach efforts. See Section E on page 1-6 in Chapter 1 and Appendix A.

A.3.5 Advisory recommendation regarding furthering the **State Planning Goal 5** [24 V.S.A. §4302]:

C-3 *“Indicate the proper map number (i.e., Map 10 instead of Map X) for historic resources on page 7-3.”*

R-3 That change was made in the revised final draft.

C-4 *“Development standard #18 (page 3-27) specifically references erosion control and storm water strategies only for development on steep slopes (15-24%) in rural conservation areas and rural agricultural & forestry areas. What about development of areas without steep slopes in these areas? Furthermore, aren’t such measures relevant for development on such slopes in other future land use areas?”*

R-4 In response, the references to rural conservation areas and rural agricultural and forestry areas were deleted. In the final revised document, this standard now applied broadly on slopes between 15-24% throughout the entire region.

A.3.9 Advisory recommendation regarding furthering the **State Planning Goal 9** [24 V.S.A. §4302]:

C-5 *“The plan encourages more agricultural production in the region. Regenerative agriculture is encouraged but there is no discussion of what that entails. Agricultural soils are presented on two maps (page 6-3 and Map 7) and statements that they be protected are included on pages 6-2 and 6-3. However, a comprehensive plan for growth in regional agricultural production and protection of agricultural soils is not offered here, nor are relevant policies included in the list of policies at the end of the chapter. Consider revising to include strategies for achieving these aims in this chapter.”*

R-5 A hyperlink to more information about regenerative agriculture was added. Since this is a vague, aspirational statement, we did not think additional detail is warranted at this time. Future amendments may expand upon that concept.

Development Standard 21 (page 3-30) and Natural Resource Policies 1 and 2 (page 6-23) provide context for how the protection of agricultural soils could happen. Act 250 also has a robust role in that endeavor. More broadly, the state and national economics of farming is beyond our control, but Development Standard 20 (Page 3-30) encourages diversification of farming activities, in part, to make farms more viable.

C-6 *“Indicate the proper map number (i.e., Map 10 instead of Map X) for historic resources on page 7-3.”*

R-6 This change was made in the final revised document.

A.3.10 Advisory recommendation regarding furthering the **State Planning Goal 10** [24 V.S.A. §4302]:

C-7 “Natural resource policy #18 says, “Support mineral resource extraction as an important component of the working landscape economy...” Consider bolstering this language by encouraging evaluation of important deposit areas prior to development that would preclude future use of this finite resource.”

R-7 In response to this comment, language emphasizing mineral surveys prior to development was added to the policy. We will revisit this in a future amendment.

A.3.11 Advisory recommendation regarding furthering the **State Planning Goal 11** [24 V.S.A. §4302]:

C-8 “Consider clarifying what percentage of the overall housing targets should be affordable for low to moderate income households.”

R-8 In response, we added more detail on the affordability for our housing targets on page 9-13 in the Housing Chapter. It is also included in Appendix C.

C-9 “Consider stronger language to educate municipalities and guide municipal land use regulations to ensure that multifamily and manufactured housing can be constructed in locations similar to those generally used for single-family dwellings.”

R-9 We believe that is adequately discussed in this Regional Plan, notably in the second and third bullets on page 9-15 and the bullet regarding the HOME Act and Act 181 near the top of page 9-16 in the Housing Chapter. MARC staff will continue to educate municipalities and provide regulatory guidance about these requirements.

A.3.12 Advisory recommendation regarding furthering the **State Planning Goal 12** [24 V.S.A. §4302]:

C-10 “The Emergency Management chapter (chapter 5) begins with broad goals like other chapters in the plan, but lacks any policy statements at the end of the chapter. Consider adding relevant policy statements or recommendations to highlight agreed-upon courses of action to achieve the goals of the chapter.”

R-10 In response, MARC added emergency management policies on pages 5-10 and 5-11 in the Emergency Management Chapter.

A.3.15 Required revision regarding furthering the **State Planning Goal 15** [24 V.S.A. §4302]:

C-11 “The plan should be revised to provide an environmental benefits and burdens analysis and to detail the public engagement process related to environmental justice focus populations.”

R-11 In response, MARC developed an analysis of environmental benefits and burdens. In the 2022 Regional Plan, Chapter 8 had no content and simply referred to Volume 3 for the Enhanced Energy Plan. We deleted that former reference. Instead, the new, revised Chapter 8 in the 2026 Plan is now the Environmental Burdens and Benefits analysis. Our analysis is similar to what Addison County RPC included in their Regional Plan.

As part of our analysis, we conducted additional outreach to collect input. This included engagement efforts as summarized in Chapter 1 (Volume 1), Volume 2 (Regional Transportation Plan), and Appendix

A (Public Outreach Summary). Overall, outreach efforts involved surveys, websites, public informational meetings, attending local board meetings, tabling at events, listening sessions, direct outreach to stakeholders, open houses, public hearings, and other efforts. Despite our efforts, it remained a challenge to get broad citizen participation, especially from environmental justice focus populations. As a result, we engaged regularly with organizations that work very closely with those population groups and others who may not be adequately represented in our other outreach efforts.

Chapter 8 and Chapter 9 revisions regarding affordable housing and environmental justice were provided and presented on July 7, 2026 to a broad stakeholder group for input. That stakeholder group included the Springfield Area Local Housing Coalition which has representation from the Agency of Human Services, Springfield Supportive Housing Program, Springfield Housing Authority, North Star Health Center, Windham and Windsor Housing Trust, Legal Aid, Town of Springfield, Southeastern Vermont Community Action, Pathways, Housing and Homelessness Alliance of Vermont, VT Economic Services Division, Windsor County Youth Services, Health Care and Rehabilitation Services of Southeastern Vermont, UVM Supportive Services for Veteran Families, Springfield Regional Development Corporation, and Housing Providers Alliance of Southern Vermont. That same stakeholder group was collaborated with over the past two years, including other presentations on April 1, 2025, October 6, 2025, and April 7, 2026.

C. Conformance with outreach requirements of 24 V.S.A. §4348(a):

C-12 *“The draft regional plan appears to have been developed with the participation of its member municipalities, and the RPC appears to have provided for meaningful participation to communities throughout the region. However, as noted under the Goal 15 response, more information about outreach to environmental justice focus populations is needed.”*

R-12 See our response above in relation to the required revisions for State Planning Goal 15.

D.9 Advisory recommendations regarding the **housing element requirements** in 24 V.S.A. §4348a:

C-13 *“Consider clarifying what housing target numbers will be the target for the region and its constituent municipalities – i.e., low target, high target, or something in between.”*

R-13 Given our low housing production rate in southern Windsor County, we selected the “low” housing target for the regional and municipalities to strive for in this Regional Plan. See the discussion in Chapter 9 for more detail.

C-14 *“Consider clarifying what percentage of the housing targets are planned to be met in the region’s centers and neighborhood areas.”*

R-14 Approximately 2/3 of the housing targets are planned to be accommodated within the designated higher-density growth areas (i.e., Downtown Centers, Village Centers, Planned Growth Areas, and Village Areas combined). See page 3-5 in the Land Use Chapter (Chapter 3) and page 9-11 in the Housing Chapter (Chapter 9).

D.12 Advisory recommendations regarding the **future land use requirements** in 24 V.S.A. §4348a:

C-15 *“Correct the future land use mapping GIS data to eliminate sliver area gaps between polygons.”*

R-15 In response, MARC staff surveyed the Future Land Use (FLU) mapping data and repaired many small mapping errors from the data. These gaps and slivers were artifacts of small differences between data sources upon which the FLU data was based.

C-16 *“Note – Table 5.3 on page 5-5 of the plan needs to be updated to reflect the status of community regulations – e.g., Ludlow river corridor bylaws.”*

R-16 Both the Town and Village of Ludlow have adopted river corridor bylaws recently. Table 5.3 has been updated accordingly. See page 5-5 in the Emergency Management Chapter (Chapter 5).

Village Centers

Advisory recommendation for **Proctorsville Village Center**:

C-17 *“Consider extending the boundary on the east side of Depot Street to the full extent of the parcels in question.”*

R-17 In response, the boundary of the village center in Proctorsville was snapped to the parcel lines of properties previously partially in the Village Center and that have frontage on the eastern portion of Depot Street.

Planned Growth Areas (PGA)

Required revisions for **Chester Planned Growth Area**:

C-18 *“Provide justification for inclusion or select a different FLU area type for some Planned Growth Areas that fall within the flood hazard or river corridor areas. Per 24 V.S.A. 4348a(a)(12)(B)(iv), Planned Growth Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines ‘infill development’ as being, ‘an area that was not previously developed but is surrounded by existing development.’”*

R-18 In response, the Chester PGA was modified to exclude areas in the Flood Hazard Area and River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11.

For more detail as it relates to all PGAs and VAs, see MARC’s memorandum about flood hazard and river corridor mapping methodology dated August 4, 2026.

Required revisions for **Springfield Planned Growth Area**:

C-19 *“Remove the long, narrow extension of the planned growth area along the Black River that extends to the Route 11, Paddock Road intersection.”*

R-19 In response, this section of the Springfield PGA (mapped in error) was removed and re-merged into the surrounding FLU categories.

C-20 *“Provide justification for inclusion or select a different FLU area type for some Planned Growth Areas that fall within the flood hazard or river corridor areas. Per 24 V.S.A. 4348a(a)(12)(B)(iv), Planned*

Growth Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines ‘infill development’ as being, ‘an area that was not previously developed but is surrounded by existing development.’”

R-20 In response, the Springfield PGA was modified to exclude areas in the Flood Hazard Area and River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11.

Required revisions for Windsor Planned Growth Area:

C-21 *“Provide justification for inclusion or select a different FLU area type for some Planned Growth Areas that fall within the flood hazard or river corridor areas. Per 24 V.S.A. 4348a(a)(12)(B)(iv), Planned Growth Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines ‘infill development’ as being, ‘an area that was not previously developed but is surrounded by existing development.’”*

R-21 In response, the Windsor PGA was modified to exclude areas in the Flood Hazard Area and River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11 Village Areas.

Village Areas (VA)

Advisory recommendations for Ludlow Village Area:

C-22 *“Consider expanding the village area to allow more new development so that the village can grow and be more flood resilient.”*

R-22 In response, we expanded the proposed Ludlow Village Area outside of higher probability flood hazard and river corridor areas and based on significant input from Ludlow staff, municipal officials, and from the public.

Advisory recommendations for North Springfield Village Area:

C-23 *“Consider selecting a different FLU area type for some village areas that fall within the flood hazard or river corridor areas. Per 24 V.S.A. 4348a(a)(12)(C)(iii), Village Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines ‘infill development’ as being, ‘an area that was not previously developed but is surrounded by existing development.’”*

R-23 In response, the North Springfield Village Area was modified to exclude areas in the Flood Hazard Area and River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-13.

Required revisions for Windsor Prison Village Area:

C-24 *“Select a different FLU area type for this village area.”*

R-24 With considerable additional input from Windsor staff, town officials, state officials, and the public, MARC changed the future land use category designation to Redevelopment Area. Please see the revised Future Land Use Map and related narrative in the Land Use Chapter (page 3-15).

The Town of Windsor is currently beginning an update of their Town Plan, which may inform future planning for this portion of town. We intend to revisit this Regional Plan designation after the Town Plan update is complete and consider a future amendment, if warranted.

Transition or Infill Areas

Advisory recommendations for **Transition/Infill Areas**:

C-25 *“Consider selecting a different FLU area category for transition/infill areas that fall within the flood hazard or river corridor areas. Example areas include:*

- *“Cavendish, adjacent to Cavendish Village Center – South of the Cavendish Village Center, across the Black River to the railroad tracks.*
- *“Cavendish, adjacent to Proctorsville Village Center – Long linear area along the Black River and railroad area.”*

R-25 In response, the Transition/Infill Areas in Cavendish were adjusted to exclude the majority of the flood hazard area and river corridor. The areas excluded from the Transition/Infill Areas were converted to either Rural – Conservation or Rural – General as appropriate. Areas which were left in the Transition/Infill category either are appropriate for infill development, or are small enough to create a undesirable patchwork effect to the map.

E. Tier 1B Area Status

C-26 Chester: *“To the extent, that the underlying future land use areas do not appear to meet the requirements of 24 V.S.A. § 4348a(a)(12)(A)-(C) as described in Section I(D)(12)(A)-(C) of this preapplication response, additional revision may be necessary before Tier 1B status can be conferred to the Town of Chester.”*

R-26 In response the Chester PGA/Tier 1B was modified to exclude areas in the Flood Hazard Area or River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11.

C-27 Springfield: *“To the extent, that the underlying future land use areas do not appear to meet the requirements of 24 V.S.A. § 4348a(a)(12)(A)-(C) as described in Section I(D)(12)(A)-(C) of this preapplication response, additional revision may be necessary before Tier 1B status can be conferred for this Springfield area.”*

R-27 In response, the Springfield PGA/Tier 1B and North Springfield Village Area/Tier 1B were modified to exclude areas in the Flood Hazard Area or River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11 and 3-13.

C-28 Windsor Downtown Center and Planned Growth Area: *“To the extent, that the underlying future land use areas do not appear to meet the requirements of 24 V.S.A. § 4348a(a)(12)(A)-(C) as described in Section I(D)(12)(A)-(C) of this preapplication response, additional revision may be necessary before Tier 1B status can be conferred for this Windsor area.”*

R-28 In response, the Windsor PGA/Tier 1B was modified to exclude areas in the Flood Hazard Area or River Corridor except where properties meet the definition of infill as given in Section 29-201 of the Vermont Flood Hazard and River Corridor Rules. This requirement is noted in the plan by reference on page 3-11

C-29 Windsor Prison Redevelopment Site – Village Area: *“The Tier 1B status request for this Windsor village area does not appear to meet the requirements of 10 V.S.A. § 6033(c).”*

R-29 In response, this area was recategorized as a Redevelopment Area and the affected land area on the future land use map was significantly reduced in size. This area has been withdrawn from consideration as a Tier 1B status area.

Vermont Department of Public Service Comments

(Volume 3 Enhanced Energy Plan)

Standard 4

C-30 Page 13, bullet 3 references the “Long-Range Energy Alternatives Planning (LEAP) system” – LEAP now standards for Low Emissions Analysis Platform; the name of the model developed in the LEAP software is Vermont Pathways (similar references in Section III should also be corrected – ex. Pg 21, thank you!)

R-30 That has been addressed on page 9 and 22.

C-31 Page 18 references “The 2022 CEP establishes a goal of meeting 100% of energy needs with carbon-free resources by 2032, with at least 75% coming from renewable sources.” - while this is discussed in the CEP, the updated Renewable Energy Standard sets the policy for the state which is more aggressive, now requiring utilities to purchase 100% of their electricity from renewable resources by 3035 (some by 2030).

R-31 That has been addressed on page 18.

4A:

C-32 Page 19, table 7 – Can you please clarify what is being displayed here? Is this the total electricity consumption for the three year periods indicated by town? Or average annual for the three year period?

R-32 That has been addressed on page 20.

C-33 Page 19 states “Fuel sources for GMP generating facilities are primarily renewable, with hydro, nuclear, and wind comprising 82%.9” but the source shows GMP now at nearly 100% carbon free both pre and post REC retirement.

R-33 That has been addressed on page 20.

4B:

C-34 *Generally looks good, although having targets for heat pump, weatherization, and other strategies to help achieve renewable fuel use / conservation in the thermal sector would be helpful to highlight those needs.*

R-34 That has been addressed by adding references to the existing Table 2 (see p. 25) and Table 4 (see p. 15 & 29).

C-35 *In the standards checklist, please be more specific with the page numbers where parts of the energy plan specifically speak to the standard.*

R-35 We have updated the checklist accordingly.

C-36 *Actually naming the percentage of fuel use that is renewable in each target year for the residential, commercial, and industrial sectors would be helpful – this is done in the text for some of the target years but not always all of them (often just 2015 and 2050), even though the underlying data is visualized in the figures.*

R-36 That has been addressed on pages 26, 30, and 32.

4C:

C-37 *Overall looks good, for the standards checklist, it would be helpful to include relevant pages from the Land Use and Transportation chapters (referenced on page 32).*

R-37 That has been addressed on page 34 and updated the checklist.

4D:

C-38 *See targets for renewable generation, do not see targets for “electric efficiency improvements” (for the region or in town profiles in the appendix) or an evaluation of “electric-sector conservation and efficiency needed to achieve these targets”. Both of these will be needed in order to achieve the standard.*

R-38 That has been addressed on page 27-28.

Standard 5:

C-39 *Generally looks good, added a note in the standards checklist of when these were sent to municipalities would be helpful.*

R-39 We have updated the checklist accordingly. The Town Profiles are finalized to include the “4D” info. They have been sent to our towns and are available on our website.

Standard 6:

C-40 *Overall looks good, minor comment: On Page 43 There is a statement in the green box that says, “Total regional energy use to decrease by 50%”. On the next page (p.44) the callout box states: “By*

2050, electricity consumption will increase to 67% of overall energy use in the region.” The statement on page 43 appears to be an energy conservation goal, however it is not clear that this is the case. Would be good to make it clear that this is a goal of the energy conservation strategies listed on page 43 otherwise it appears to contradict the statement on page 44. Green box was deleted. The other statement (by 2050...67%) is accurate and can stay.

R-40 This has been addressed on page 43 by changing the call-out box from “Total Regional energy use to decrease by 50%” to “By 2050, 90% of Vermont’s total energy will be derived from renewable sources.”

Standard 9

C-41 *As noted in the standards, the PUC will give substantial deference to “land conservation measures and specific policies” in plans. I.e., what is allowed where, described in words. Policy language should be specific, unambiguous, unqualified regarding the specific area and type of permissible development. Make sure areas that are unsuitable or preferred should be described (in addition to mapped) and the characteristics of development discouraged or encourage in those areas should be specified. Cross-referencing policy statements to maps and features (e.g., include citation to “known constraints” list and map) would be helpful.*

R-41 That has been addressed on page 39 by describing areas in the region which would be considered preferred sites.

C-42 *“Encourage infrastructure improvements” and “Encourage the location of solar projects on preferred sites” but not much else in the way of policies and objectives to develop on preferred sites. Would be helpful to see more focus on a.-d. on page 37 if municipally preferred sites are lacking.*

R-42 This has been addressed on page 39 under Preferred sites.

C-43 *Please update references on page 18 to data from 2024 VELCO LRTP.*

R-43 That has been addressed on page 18.

Standard 10

C-44 *The Department understands this is a new standard and that best practices for meeting it are still being established, but expects a more in-depth discussion, at least, of how issues related to equity are being understood and addressed in the regional plan or will be addressed by MARC in their energy-related work moving forward in order to achieve the standard. This could take a variety of forms, including identifying specific communities in the MARC region that may need additional support in making the energy transition or be vulnerable to being left behind or discussing how MARC will or has engaged with communities in the region in the development of this plan or in the development of future work.*

R-44 This has been addressed in Volume 1, Regional Plan, Chapter 8, Benefits and Burdens.

Standard 11

C-45 *Please indicate in the legend of Appendix E-1 the size of projects (e.g., all sizes; 15 kW and larger; etc.).*

R-45 This has been addressed in the legend of Map E-1 to indicate that this maps distributed generation of all sizes in the region.

Standard 12

C-45 *Please confirm your mapping of vernal pools included both VCE “confirmed” layers (for Known Constraints) and “potential and probable layers” (for “Possible Constraints”).*

R-45 Confirmed and addressed on page 38.

C-46 *Please confirm Possible Constraints maps include Highest Priority Physical Landscape Blocks.*

R-46 Confirmed and addressed on page 39.

C-47 *Please clarify in the text how “Forested Areas” are treated in mapping (Known or Possible constraints? And within that, are they Regionally or Locally Identified Resources?).*

R-47 This has been addressed on page 39.

C-48 *Please include some comparison of municipal generation targets and distribution hosting capacity in the body of the plan or the Municipal Summary Worksheets.*

R-48 This has been addressed by updating Table 14 and on page 36.

C-49 *Mapping of preferred sites deemed acceptable, as stated on page 37, is strongly encouraged for compliance with standard 12.E.i. Even if locally preferred locations can’t be easily identified, can MARC identify and map any large rooftops, brownfields, extraction sites, and/or vacant lands within industrial parks?*

R-49 This has been addressed on page 39 by description.

Standard 13

C-50 *If you mark “Yes,” under Standard 13, you need to provide sufficient rationale to any “No” responses under Standards 13.A. and 13.B. in order to justify the basis for treating energy differently from other development.*

R-50 Addressed in checklist.

Standard 15

C-51 *On what timeline does MARC plan to create enhanced energy maps for your member municipalities?*

R-51 A few towns are updating their town plans this year. We will create or update enhanced energy maps at the best time for each town plan update schedule.

Vermont Agency of Transportation Comments

(Volume 2 Regional Transportation Plan)

C-52 *The Agency requests the plan include a definition or description of the Invalid road classification category on map T-3: MARC Pavement Surface Condition.*

R-52 Map T-3 is generated from VTrans pavement condition data and the invalid category is an artifact of that data source. The roads marked invalid have been removed from map T-3.

C-53 *The Agency requests the plan also includes a map of the region’s railroads, or that they be added to an existing map*

R-53 Map T-8: Rail Lines in the MARC Region has been added.

C-54 *The Agency recommends the plan include maps of bicycle and pedestrian infrastructure*

R-54 Map T-9: MARC Active Transportation Infrastructure has been added.

C-55 *The plan’s narrative discusses points of congestion with respect to winter ski resort traffic on routes VT-11 and VT-103. And the table of outstanding transportation needs (beginning on page 52) includes projects to improve traffic flow during peak hours. The Agency recommends mapping these areas of congestion (with notes where congestion may be seasonal), perhaps onto the existing map T-4: Average Daily Traffic Volumes.*

R-55 Intersections and corridors with congestion issues have been added to map T-4 MARC Average Daily Traffic Volumes and to section 3.1 Road Network.

C-56 *The Agency also requests the plan be updated to include regional context for map T-4. Average daily traffic volumes are an important consideration in asset management and future development, but to be most useful for future planners, a clearer description of the data’s implications is necessary.*

R-56 Added language to Section 3.1 Road Network expanding on AADT and congestion implications for future development and importance of AADT for evaluating and prioritizing bicycle and pedestrian and complete streets improvements.

C-57 *The Agency recommends the plan include a narrative of roadway and intersection safety issues and mitigation recommendations. The plan articulates safety as a priority, and the table of outstanding transportation needs highlights a few safety projects. A section of narrative in Chapter 2: Regional Trends and Issues describing safety issues observed in the region (e.g., high crash locations, truck turning constraints, multimodal concerns) would provide additional support and context for the stated priorities, goals, and funding opportunities for safety projects already identified in the plan.*

R-57 A section on Roadway Safety was added to Chapter 2 summarizing the process and findings of the 2026 MARC Safety Action Plan.

C-58 *The Agency appreciates that this table includes the party responsible, but recommends the table be completed to include known or estimated cost. Where exact cost is unknown, it is appropriate to follow the format used in the MARC Regional Plan Table 12.1 Implementation Matrix and estimate the relative high, medium, or low cost to implement.*

R-58 Relative costs (low, medium, and high) have been assigned to the projects in Table 12.1. Some projects that have been addressed have also been removed entirely.

C-59 *Finally, the Agency requests more direct links to the MARC plans, studies, and data incorporated by reference into the Regional Transportation Plan (Major References, page 69).*

R-59 Links have been added to the Major References page. In some cases, the documents referenced are split into multiple components. In those cases, a link to the Transportation Plans and Studies page of the MARC website has been provided.

C-60 *The Agency agrees with the classification of Springfield Airport as enterprise, and recommends that railyards, rail stations, and rail sidings in the region also be included in the enterprise land use category. Rail sidings, even if not currently used, can in the future be developed into rail-related enterprise land use functions.*

R-60 MARC has avoided designating single parcels a different future land use category than their surrounding areas. The decision was made not to include sidings as enterprise to avoid such circumstances. MARC supports development of underutilized rail infrastructure and feels that most land use designations would support development that would use and benefit from rail access.

Southeast Vermont Transit Comments

(Volume 2 Regional Transportation Plan)

C-61 *Correction to Public Transportation Network section: The Marble Valley Route from Rutland to Ludlow operates only from Thanksgiving to the end of March.*

R-61 The Public Transit section was corrected to reflect the actual Marble Valley Route schedule.

Windsor Prison Site Comments

C/R-62 Numerous comments were submitted, including from the Agency of Natural Resources, town officials, other agencies and organizations, and residents regarding the Village Area designation and Tier 1B status originally proposed for the former Windsor Prison Site (aka former Southeast State Correctional Facility) . MARC staff met with state officials to discuss future planning for this site.

MARC staff also met with the Windsor Planning Commission and Selectboard, and coordinated with Windsor residents regarding sometimes competing comments regarding the prison site future land use designation. Based on input from Fish and Wildlife staff, town officials, Windsor residents and others, we recategorized this area as a Redevelopment Area and significantly reduced in size the associated geographic area for that category.

Reading Planning Commission Comments

C/R-63 The Reading Planning Commission submitted two sets of written comments and provided verbal testimony at both of MARC's public hearings. They raised a few points which are summarized below. A more detailed response to their comments is attached for your reference.

1. In general terms, the Reading Planning Commission was asking to reduce the extent of town covered by the Rural Agriculture and Forestry future land use category and increase Rural General. We made appropriate changes based on statutory frameworks, VAPDA's future land use mapping methodology, and compatibility with Reading's Town Plan. We also evaluated Reading's Zoning Bylaws as it relates to how to map the rural categories in our Regional Plan.
2. They were also asking to include new Village Centers instead of the hamlets in Hammondsville and South Reading. After consulting with staff at the Department of Housing and Community Development, we concluded that Hammondsville does not appear to meet the statutory definition, so we did not include it at this time. We think South Reading could make sense to include, but we intend to work with the Planning Commission on a process to inform a future Regional Plan amendment with that change, so we have better detail about the geographic boundary and historic resources.
3. They expressed concern with being able to meet the housing target identified for Reading (i.e., 17 new dwelling units by 2030), especially with a small Village Area. We understand that concern. MARC is similarly concerned with our ability to meet our 1,207 regional housing target for 2030. We believe there are opportunities to convert or redevelop existing properties within the Village Area for housing, contingent upon adequate wastewater and site conditions. We support the Town with any future efforts to implement the recent Felchville water/wastewater feasibility study. We also think there are opportunities for small scale, incremental housing in the other parts of town, such as accessory dwellings, manufactured homes, new starter homes, and converting a farmhouse into a duplex. Nonetheless, efforts to address the housing targets will take efforts by everyone if we are to succeed, including willing developers and property owners. MARC is available to assist Reading with planning for future housing needs.

During the July 27, 2026, public hearing and regular meeting, the MARC Board of Commissioners made clear their intent is for the Regional Plan to be a living document. After adoption, the Board directed staff to continue to coordinate with Reading and other towns to identify any necessary amendments including, but not limited to, addressing housing targets and exploring a new Village Center in South Reading.

Attached are copies of correspondence with the Reading Planning Commission regarding their comments.

June 2, 2026

TO: Reading Planning Commission
CC: Reading Selectboard
Kathy Callen-Rondeau, MARC Commissioner for Reading
FROM: Jason Rasmussen, AICP, Executive Director
SUBJECT: Response to Comments from Reading Planning Commission

Thank you for your review and consideration of the draft 2026 Regional Plan. We appreciate your comments submitted on May 15, 2026 in advance of our first public hearing. We wanted to follow up with responses to your comments.

In summary, we believe that we followed the statutory framework and a consistent mapping methodology to develop the proposed 2026 Regional Plan. We also believe that we are consistent with the Reading Town Plan.

In response to your comments, we have prepared changes to the Future Land Use Map that expands Rural General along Twenty Mile Stream Road and Tyson Road to improve consistency with the Town Plan.

We strongly encourage both the Planning Commission and the Selectboard to finalize our proposed Tier 1b status for Felchville. We can revisit the associated Future Land Use Map or the MOU for technical support as needed.

Given the timeline and where we are in the LURB process, we would like to continue working with you on local planning efforts that will inform future Regional Plan amendments, such as providing a sound basis for a new Village Center in South Reading.

More detailed responses to your comments are as follows. Please let us know if you have questions. We look forward to discussing this in more detail at the June 3rd Planning Commission meeting.

1. Lack of consistent rationale in current designations

- a. We believe that we followed a consistent rationale. In preparing our draft Future Land Use Map we followed the categories as established and defined in 24 V.S.A. §4348a. We also followed the [mapping methodology](#) that is available on [VAPDA's website](#).
- b. For example, our Rural Agriculture and Forestry category is mapped based on various factors, per the statewide methodology, including:

1. Map the Use Value Appraisal Program (aka “Current Use”) parcels, if available (optional).
2. Map the 2022 Agricultural Land Cover from Vermont Center for Geographic Information. Use as a visual screen to identify areas with a predominance of agriculture.
3. Identify areas with 20 acres or more of tree canopy and 20 acres or more of agricultural land that are connected or in proximity to other such areas so as to form large blocks. Prioritize those areas that are in UVA (optional).
4. Parcels smaller than 20 acres that do not contain natural resources qualifying for Rural Conservation could be classified as Rural – General, or in this Rural Agriculture and Forestry area to create cohesive, larger blocks.
5. Use parcel size/shape as a screen, especially on forested areas as management is difficult on smaller parcels.
6. Create logical boundaries by using parcel lines and/or geographic features such as waterways.
7. Consider how adjacent regions are mapping land areas in order to create more cohesive and contiguous areas.

2. *Recommendation regarding Rural – Conservation lands*

- a. In statute, these areas are not limited to formally conserved properties. In statute, 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.”
- b. MARC’s draft Rural Conservation area in Reading consists of state-owned or -managed lands (i.e., Coolidge State Forest, Arthur Davis Wildlife Management Area), conservation easement areas (i.e., Vermont Land Trust easements, Upper Valley Land Trust easements), large wetlands, or areas included to make cohesive and contiguous mapping areas.

3. *Recommendations for increased Village Centers / Village Areas*

- a. An initial comment from the Reading Planning Commission was to expand the Felchville Village Center to help finance future implementation of the wastewater feasibility study. There was also a request to create new Village Centers in Hammondsville and South Reading.
- b. MARC staff then coordinated with Vermont Department of Housing and Community Development (DHCD) staff, who oversaw the legacy Village Center program. Based in

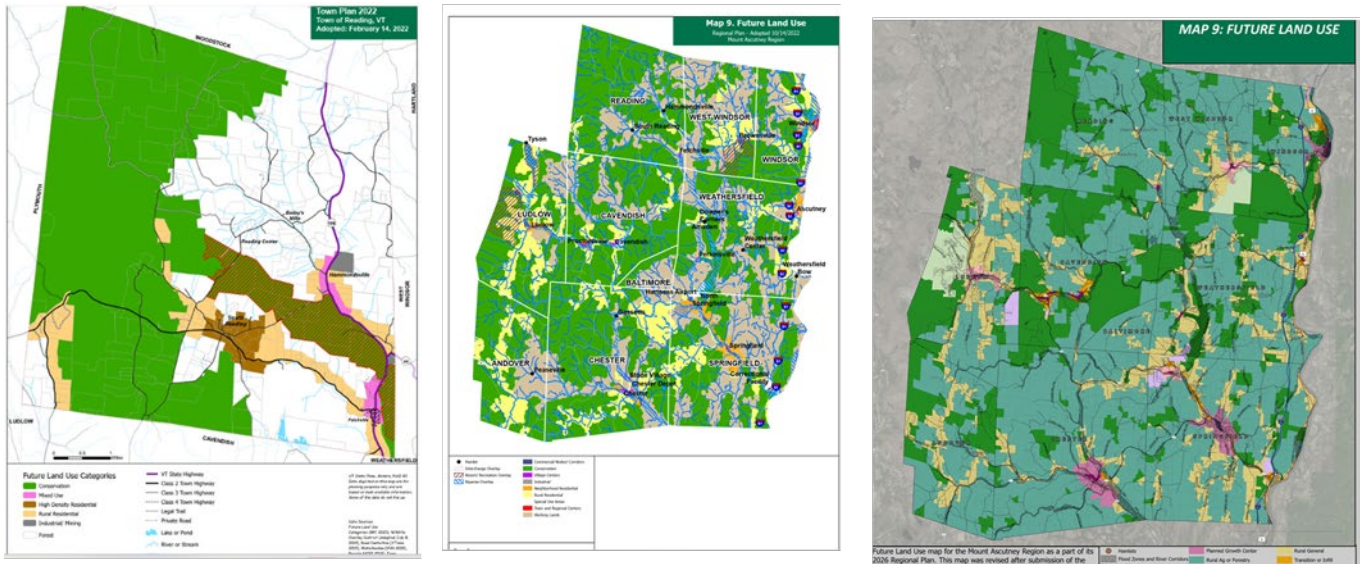
part on their input, we instead created a Village Area surrounding the Felchville Village Center. That would not only help finance future wastewater solutions, it would also provide Act 250 exemptions for housing projects, if approved by the Land Use Review Board.

- c. DHCD staff did not feel like Hammondsville met the statutory definition of a Village Center. MARC staff agree.
- d. MARC staff commit to coordinating with the Reading Planning Commission to consider future Regional Plan amendments for a new Village Center in South Reading. In order to do so, we would appreciate the Reading Planning Commission considering how it meets the definition, whether there are listed or eligible historic buildings present, and recommendations about where to draw the boundary. We also recommend amending the Town Plan with this detail.
- e. In statute, Village Centers:
 - i. “[...]re the mixed-use centers bringing together community economic activity and civic assets. ...The downtown or village centers are 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(a)(12)(A)]
 - ii. “... mean a contiguous downtown or village a portion of which is listed or eligible for listing in the national register of historic places...” [24 V.S.A. §5801]

4. *Recommendation for greater consistency outside village areas*

- a. See the response under #1 regarding following state statute and a common statewide methodology for mapping these rural areas.
- b. Comparing the 2022 Regional Plan to the draft 2026 Regional Plan:
 - i. In 2022, the vast majority of Reading was Conservation and Working Lands.
 - ii. In 2026, the vast majority remains Rural Conservation and Rural Agriculture and Forestry.
 - iii. The 2026 draft Rural Conservation shrunk significantly from the 2022 Conservation category. The 2026 draft Rural Agriculture and Forestry category correspondingly increased.
 - iv. The primary difference between Working Lands and Rural Agriculture and Forestry is that tree canopy areas of 20 acres or more were included in the latter category. In 2022, Conservation included all larger, priority forest blocks.
- c. Comparing the draft 2026 Regional Plan to the 2022 Town Plan Future Land Use Map:
 - i. The combined Conservation and Forest categories in the 2022 Town Plan are very similar to the combined draft 2026 Rural Conservation and Rural Agriculture and Forestry. The primary differences are the extent of (Town Plan) Rural

Residential vs. (Regional Plan) Rural General. We have made a few changes to be more consistent.



5. Concerns about the Rural – Agricultural and Forestry designation

- a. In addition to responses above, we believe the Regional Plan and Town Plan are very consistent.
- b. In the 2022 Town Plan, the Forest category indicates, “because of its inherent value, and because of its remoteness from most roads and other infrastructure, land in the forest category should continue to be used primarily for recreation, conservation and sustainable logging.” And further, “development densities in forest areas should be low to very low...unless a clear plan for mitigation can be presented.”
- c. The 2022 Town Plan articulates, “development densities should be very low in the Conservation area...” And, “land development in these areas should be carefully designed in order to minimize forest fragmentation and promote the health, viability and ecological function of forests.”
- d. **The Regional Plan does not prohibit development in this category.** It allows low density residential, but it seeks to minimize impacts on farm and forestry resources, similar to the Town Plan.

- e. The development standards for the Rural categories are largely unchanged from the 2022 Regional Plan. For example, compare Development Standard #15 from 2022 with #17 from 2026 (see below), or compare Development Standard #19 from 2022 with #21 from 2026.

2026 Regional Plan, Land Use Chapter, Development Standard

17. Land development in the Rural Categories must be sited and designed to minimize fragmentation of priority forest blocks and habitat connectors, and to minimize adverse impacts on natural resources and the ecological benefits they provide, including but not limited to, wetlands, floodplains, river corridors, rare, threatened and endangered species, significant natural communities, elevations above 2,500 feet, and slopes steeper than 25%.

2022 Regional Plan, Land Use Chapter, Development Standard

15. Land development in the rural countryside must be sited and designed to minimize fragmentation of priority forest blocks and habitat connectors, and to minimize adverse impacts on natural resources and the ecological services they provide, including but not limited to, wetlands, floodplains, river corridors, rare, threatened and endangered species, significant natural communities, elevations above 2,500 feet, and slopes steeper than 25%.

6. *Housing and infrastructure concerns*

- a. Reading is a small, rural town without municipal water or wastewater infrastructure. We intend to include in the draft 2026 Regional Plan a small, proposed Tier 1B area in Felchville, including the legacy Village Center combined with a proposed Village Area. We mapped the Village Area based largely upon comments received at a Planning Commission meeting, and further informed by the wastewater feasibility study.
- b. The remainder of town is largely rural and would be Tier 2 (i.e., Act 250 status quo).
- c. The housing targets for the region, provided by the state, are significantly high. The need for new housing in the region is also significant. Based on current trends, ***it is unlikely that we will meet these targets.***
- d. Based on LURB feedback, we are changing the housing targets in the Regional Plan. We intend to select the “low” housing target to serve as the official target for the region and our municipalities.
- e. We agree that the lack of infrastructure in Reading limits future development. We originally encouraged the town to prepare the wastewater feasibility study. We now encourage the town to consider how to implement the study. That is one reason why we have included the Village Area in Felchville (i.e., to create the infrastructure needed to better encourage housing and other development in Felchville).
- f. The remainder of town can produce new homes most likely in a small-scale and incremental way, if property owners or developers are so willing. These projects might

include converting a farmhouse into a two- or three-unit dwelling or constructing an accessory dwelling unit.

7. *Recommendation to reconsider broader use patterns*

- a. Considering that we need to complete changes within a month to stay on schedule for adoption and final LURB review, MARC commits to coordinating with Reading on future refinements. This might entail an initial update to the Town Plan, as appropriate, and a future amendment to the Regional Plan.

8. *Concerns regarding property rights and municipal impacts*

- a. See responses to #4 and #5. We don't think we are increasing restrictions. We believe that our three Rural categories are consistent with state statutory frameworks, and compatible with the corresponding categories in the Town Plan. (See the excerpt below for more detail on compatibility.)

Excerpt from [24 V.S.A. § 4302](#)

(2) As used in this chapter, for one plan to be “**compatible with**” another, the plan in question, as implemented, **will not significantly reduce the desired effect of the implementation of the other plan**. If a plan, as implemented, will significantly reduce the desired effect of the other plan, the plan may be considered compatible if it includes the following:

(A) a statement that identifies the ways that it will significantly reduce the desired effect of the other plan;

(B) an explanation of why any incompatible portion of the plan in question is essential to the desired effect of the plan as a whole;

(C) an explanation of why, with respect to any incompatible portion of the plan in question, there is no reasonable alternative way to achieve the desired effect of the plan; and

(D) an explanation of how any incompatible portion of the plan in question has been structured to mitigate its detrimental effects on the implementation of the other plan.

- b. **The Regional Plan is not regulatory.** Most development gets approved through local zoning permits and not Act 250. The Town Plan and local zoning and subdivision bylaws control in those cases.
- c. The Regional Plan has a role in Act 250 as does the Town Plan. If there is substantive conflict between the Regional Plan and the Town Plan, the Regional Plan controls only with projects of “substantial regional impact” as defined in the Implementation Chapter of the Regional Plan (see Chapter 12, Section A). There has never been a project of substantial regional impact in Reading to my knowledge.
- d. MARC shares the same interest in attracting new residents and businesses to Reading and our other member towns. That is one of the foundations of our plan. We do, however, prioritize areas that have a better ability to accommodate development over the most ecologically sensitive and more remote areas. We believe that the Reading Town Plan does that as well.

9. *Inconsistency between land use restrictions and housing targets*

- a. See the responses under #6.
- b. We acknowledge that it will be difficult for Reading to produce 17 new homes by 2030 and 53 by 2050. It will be similarly challenging for the region to produce 1,207 by 2030 and 3,750 by 2050. We are all in this together. We encourage you not to focus on the number, but rather to collaborate together to encourage more home starts.
- c. To meaningfully address these housing targets, it will take both public and private efforts – publicly to reduce regulatory barriers and provide infrastructure and subsidies, and private development investment, both from developers as well as do-it-yourselfers.

10. *Legislative developments*

- a. S.325 includes the repeal of Tier 3 and the Road Rule, and makes other changes to extend Act 181 related timeframes.

From: [Jason Rasmussen](#)
To: [Eve Waterfall](#)
Cc: rkallen@myfairpoint.net; [silv](#)
Subject: FW: MARC Regional Plan Public Hearing
Date: Friday, June 26, 2026 3:02:00 PM

Hi Eve,

We have considered the Planning Commission's comments in our revised draft 2026 Regional Plan. We added more Rural General to the future land use map. Some of the other areas you were asking about remain as Rural Conservation or Rural Agriculture and Forestry due to the Significant Wildlife Habitat Overlay District or other factors.

Please see below for more details about the revised plan and the upcoming second hearing. Thank you again for your continued coordination.

The timeline to get 11 regional planning commissions through the Land Use Review Board is very tight. Thankfully, the process to amend Regional Plans is now much easier. I anticipate amending the Regional Plan within a year or two. Let's continue our conversations to explore further changes together.

The state legal framework for Rural Agriculture and Forestry is, frankly, not as I would have written it. I think we did a reasonable job to meet you in the middle. We also considered what the Reading Town Plan currently calls for. I feel that the Town's Conservation and Forest areas correspond closely with the Region's Rural Conservation and Rural Agriculture and Forestry.

I am very open to consider a future amendment to make South Reading a Village Center. Ideally, more detail and context for it in the Town Plan would help. We can assist with a quick Town Plan amendment if that is of interest. I hope we can discuss that in the near future.

Thanks,
Jason

From: Jason Rasmussen <jrasmussen@marcvt.org>
Sent: Friday, June 26, 2026 2:21 PM
To: Jason Rasmussen <jrasmussen@marcvt.org>
Cc: Martha Harrison <mharrison@marcvt.org>; Allison Hopkins <ahopkins@marcvt.org>; Kellen Appleton <kappleton@marcvt.org>; Otis Ellms-Munroe <oellmsmunroe@marcvt.org>; Chris Yurek <cyurek@marcvt.org>; Lisa Comstock <lcomstock@marcvt.org>
Subject: MARC Regional Plan Public Hearing

The Mount Ascutney Regional Commission (MARC) will hold the second of two public hearings on Monday, July 27, 2026, at 12:00 noon in the Windsor Town Offices at 29 Union Street in Windsor, VT on the proposed 2026 Regional Plan, which addresses the requirements of Act 181 and will replace the 2022 Regional Plan. The intent of this plan update is to meet the new requirements in 24 V.S.A. §4348a as well as to meet the requirements of an Enhanced Energy Plan in accordance with 24 V.S.A. §4352.

Second Public Hearing

When: 12:00 PM on Monday, July 27, 2026

Where: Selectboard Meeting Room, Windsor Town Offices, 29 Union Street

Virtual Link: <https://us02web.zoom.us/j/87047568278>

Meeting ID: 870 4756 8278

[Visit MARC's website](#) to review the plan and related documents listed below in accordance with 24 V.S.A. §4348(d):

- The final draft 2026 Regional Plan is available for review under the “Publications” section on MARC’s website: <https://www.marcvt.org/2026-regional-plan.html>.
- [Report documenting conformance with state planning goals in 24 V.S.A. §4302 and the plan elements established in 24 V.S.A. §4348a.](#)
- [Written description of changes to the Regional Future Land Use Map.](#)
- Have questions about the Regional Plan and Act 181? Check out our [Frequently Asked Questions \(FAQ\) here.](#)

To request a hard copy of the draft plan, please contact the MARC at (802) 674-9201. If you have comments, please contact [Kellen](#) or [Martha](#).



Jason Rasmussen, AICP

Executive Director

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