

From: [Ramona Emery](#)
To: [Act250 - Board](#)
Subject: Public Comment in Concern For Case RPC06-0001 (Springfield Tier 1B Application)
Date: Thursday, October 1, 2026 11:33:01 AM

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Dear Chair and Members of the Land Use Review Board,

I am writing as a Springfield resident and utility ratepayer to request that the Board closely scrutinize the long-term infrastructure and tax equity metrics of Springfield's Tier 1B request under application RPC06-0001.

While the state's goal is to fast-track housing by reducing Act 250 oversight, the true financial infrastructure reality on the ground cannot be ignored as there is severe infrastructure liability: Springfield's underlying water and sewer lines are over 55 years old. Our community recently faced a massive \$16 million infrastructure bond ceiling to overhaul just a half-mile of these critical lines. Even after accounting for state revolving funds and federal principal forgiveness, local ratepayers will remain locked into a vulnerable 40-year debt cycle to pay off the remaining balance.

Recent major developments prove that dense infill relies entirely on public lifelines rather than market viability. The Woolson Block required \$200,000 from our local Revolving Loan Fund, the Ellis Block required some \$20 thousands of municipal fund injection and the Park Street School/BRIC redevelopment is absorbing millions in federal HUD and state taxpayer funds just to meet basic code.

Furthermore, these subsidized properties operate under heavily reduced Payment in Lieu of Taxes (PILOT) agreements, placing high daily physical strain on our aging pipelines without paying a full, regular share of property taxes to support the broader municipal public works system.

While federal funding, CHIP tax-increment diversions, and regional development corporation (SRDC) monies seamlessly circulate among state agencies and non-profit syndicators like Evernorth to fund building construction, local citizens carry 100% of the downside risk. We carry the burden of the subsidies and the 40-year utility bonds, yet we are completely locked out of any actual investment or wealth-building opportunities in our own downtown.

If state-subsidized agencies and regional development corporations require massive layers of public funds just to make their utilities viable, our infrastructure cannot safely absorb unvetted private or public-private developments requiring yet more tax and ratepayer monies.

I urge the Land Use Review Board to protect local utility ratepayers and taxpayers by conditioning any Tier 1B approvals on explicit, localized financial protections for the residents who are actually underwriting these systems.

I request that these concerns be formally entered into the review record.

Respectfully submitted,
Ramona Emery

Springfield, VT