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**To:** [Act250 - Board](#)  
**Subject:** WRC July 8 public comment  
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- What objective methodology was used to classify every parcel?
- What percentage of parcels were field verified?
- What GIS accuracy standards were used?
- What independent review was conducted?
- How were property-owner comments incorporated?
- How were municipal recommendations accepted or rejected?
- How were conflicts between datasets resolved?
- What appeal mechanism exists for erroneous classifications?
- How are you identifying and avoiding conflicts of interest?
- How are existing wetland delineations on file with ANR incorporated into the plan?
- How were existing wastewater permits and wells incorporated into the plan?
- Were soil tests used to identify agricultural land?
- Were Tree inventories and health conducted to identify forest land?
- Were mapped wetlands substituted for jurisdictional wetlands?
- Were BioFinder layers treated as regulatory rather than advisory?
- Are you comfortable advancing the plan without updated flood hazard information?
- Were analysis conducted for economic impact, tax base reduction, agricultural impact, or housing capacity?
- Did WRC document margin of error rates, GIS accuracy, field verification criteria, and a process for quality assurance?
- Does the plan balances competing planning goals?
- Does the plan adequately explain classifications?
- Many determinations are arbitrary and capricious and lack due process.

Kevin Coffman Bopp