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Date: November 5, 2025

To: Keith Osborne, Richmond Town Planner

From: Darren Schibler, CCRPC Senior Planner

Re: Formal Review of the Draft 2026 Richmond Town Plan, Including Enhanced Energy Plan Review

The Town of Richmond has requested, per 24 V.S.A. § 4350, that the Chittenden County Regional Planning Commission (1) approve its draft 2026 Richmond Town Plan; (2) confirm its planning process; and (3) issue an affirmative determination of compliance with the enhanced energy planning standards set forth in 24 V.S.A. § 4352.

This draft 2026 Richmond Town Plan is an update of the 2018 Town Plan, the most significant of which have been in the Future Land Use section and associated map in response to Act 181. CCRPC staff informally reviewed the 2017 plan and provided a memo to Town in December 2023 with recommendations to improve the plan. At the time of this review the Town Plan is a substantially complete draft. The only anticipated edits before the Planning Commission's first public hearing on May 20, 2025, at 7 pm will be in response to this formal review.

Confirming and Approving the Municipal Plan

Following the Chittenden County Regional Planning Commission's (CCRPC's) *Guidelines and Standards for Confirmation of Municipal Planning Processes and Approval of Municipal Plans (2018)* and the statutory requirements of 24 V.S.A. Chapter 117, CCRPC staff have reviewed the draft 2026 Richmond Town Plan to determine whether it is:

- Consistent with the general goals of § 4302;
- Consistent with the specific goals of § 4302;
- Contains the required elements of § 4382;
- Compatible with the 2018 Chittenden County Regional Plan, entitled the *2018 Chittenden County ECOS Plan* (per § 4350); and
- Compatible with approved plans of other municipalities (per § 4350).

Additionally, CCRPC staff have reviewed the planning process requirements of § 4350.

Staff Review Findings and Comments

1. The draft 2026 Richmond Town Plan is consistent with the general goals of § 4302. See the attached Appendix A submittal that evaluates how the Plan is consistent with these goals.
2. The draft 2026 Richmond Town Plan is consistent with the specific goals of § 4302. See the attached Appendix A submittal that evaluates how the Plan is consistent with these goals.
3. The draft 2026 Richmond Town Plan contains the required elements of § 4382, with the exception of “Edits Required for CCRPC Approval” detailed below. See the attached Appendix A submittal that evaluates how the Plan is consistent with these goals.
4. Succinctly address the new statutory goals and elements that are not covered in Appendix A.
5. The draft 2026 Richmond Town Plan addresses compatibility with the planning areas, goals and strategies of the draft 2026 Chittenden County Regional Plan, entitled the *2026 Chittenden County ECOS Plan*. However, this is not the currently effective regional plan and it is scheduled for adoption in summer 2026, at least 3 months after adoption of the 2026 Richmond Town Plan in March 2026. Therefore, compatibility with the current 2018 Chittenden County Regional Plan (the *2018 Chittenden County ECOS Plan*) must be addressed in Richmond’s 2026 Town Plan.
6. The draft 2026 Richmond Town Plan claims, but does not substantially address, compatibility with the municipal plans for adjoining municipalities (Williston, Jericho, Bolton, Huntington, and Hinesburg). This has been added under “Edits Required for CCRPC Approval” and shared with Richmond staff.
7. Richmond has a planning process in place that is sufficient for an approved plan. In addition, Richmond has provided information about their planning budget and CCRPC finds that Richmond is maintaining its efforts to provide local funds for municipal and regional planning.

Commented [TN1]: [@Darren Schubert](#)

Edits Required for CCRPC Approval:

1. The “Compatibility” section of the Introduction states that it is compatible with the plans of adjacent municipalities, and there are a few general sentences comparing Richmond to other municipalities in the “Current Land Use” paragraph of Section 6. While this helps contextualize Richmond’s land use policies, the Plan does not specifically discuss the future land use areas in both Richmond and its adjacent municipalities along their shared boundaries. The future land use areas and/or zoning districts along these boundaries should be discussed in more detail.
2. The plan thoroughly addresses compatibility with the draft 2026 regional plan. However, this will not be adopted until well after the Richmond Town Plan is adopted, so compatibility with the current (2018) regional plan must also be

addressed. This can be done by stating that the 2018 ECOS Plan's future land use areas are generally compatible with the 2026 Richmond Town Plan except where new state laws and CCRPC interpretation thereof has led to differences.

- a. Specifically within this, it should be clarified that the Richmond plan's "Village Areas" are mapped as "Planned Growth Area" in the draft 2026 regional plan, which generally align with the "Village" future land use category in the current 2018 regional plan.
3. Discussion of the municipal housing target must include the 2030 targets in addition to the 2050 targets.
4. The regionally assigned housing targets should be updated according to the latest draft of the ECOS Plan (published 9/11/2025). Also, the regionally assigned housing targets should be updated according to the latest draft of the ECOS Plan (published 9/11/2025).

Additional Edits Recommended, but Not Required for CCRPC Approval:

1. Consider greater differentiation in the Future Uses between Village Center and Village Area, perhaps emphasizing more residential uses in the latter.
2. The description of the Enterprise Areas would benefit from clarification about compatibility of residential and commercial uses.
3. Descriptions of the state planning designation program on pp. 52 and 54 should be updated in light of Act 181.
4. The discussion of Tier 1B status in the last paragraph under "State Legislation and its impact on Richmond" should clarify that the Richmond Selectboard requests Tier 1B status, and also that it would provide exemption for housing projects of fewer than 50 dwelling units on 10 or fewer acres of land.
5. There is no reference to the Richmond Annex of the regional All-Hazards Mitigation Plan. This is not required for regional approval, but should be included to maintain Richmond's access to federal and state funding for hazard mitigation planning funds.
6. The earth resource extraction policy in Section 9, Goal 1, Action 5 simply repeats the statutory goal in 24 V.S.A. § 4302(c)(10). While this is sufficient to gain regional approval, we recommend being more specific about where earth resource extraction is or is not allowed, along with any general requirements for how it is carried out. This could be done by referencing the Enterprise Area in the Land Use section (which contains these details).
7. While the plan discusses inclusion and addressing the needs of vulnerable populations, data on population race and ethnicity data are notably absent. This should be discussed even if only to say that reliable data are not available.

Enhanced Energy Plan Review

Following the statutory requirements of 24 V.S.A. § 4352 and Vermont Department of Public Service's Energy Planning Standards for Municipal Plans, CCRPC staff reviewed the 2026 Richmond Town Plan to determine whether:

1. The Comprehensive Plan includes an energy element that has the same components as described in 24 V.S.A. § 4348a(a)(3) for a regional plan and is confirmed under the requirements of 24 V.S.A. § 4350.
2. The Comprehensive Plan is consistent with following State goals:
 - a. Vermont's greenhouse gas reduction goals under 10 V.S.A. § 578(a);
 - b. Vermont's 25 by 25 goal for renewable energy under 10 V.S.A. § 580;
 - c. Vermont's building efficiency goals under 10 V.S.A. § 581;
 - d. State energy policy under 30 V.S.A. § 202a and the recommendations for regional and municipal energy planning pertaining to the efficient use of energy and the siting and development of renewable energy resources contained in the State energy plans adopted pursuant to 30 V.S.A. §§ 202 and 202b (State energy plans); and
 - e. The distributed renewable generation and energy transformation categories of resources to meet the requirements of the Renewable Energy Standard under 30 V.S.A. §§ 8004 and 8005.
3. The Town Plan meets the standards for issuing a determination of energy compliance per the Public Service's Department Energy Planning Standards for Municipal Plans, with the exception of "Edits Required for CCRPC Determination of Enhanced Energy Plan Compliance."

Staff Review Findings and Comments

Consistency with the requirements above is evaluated through the Vermont Department of Public Service's Energy Planning Standards for Municipal Plans, which is attached to this document and briefly summarized below.

Standard	Met	Not Met	Comments / Deficiencies	Location in plan
1. Plan duly adopted and approved			Necessary for final determination	N/A
2. Submit a copy of the adopted plan			Necessary for final determination	N/A
3. Plan contains an energy element	X			Section 5, pp. 31-40
4. Analysis of resources, needs, scarcities, costs and problems in	X			Pp. 31-36; Appendix Section 4

the municipality across all energy sectors				
5.a. Report current energy use for heating, electricity, and transportation		X	Natural Gas consumption data needs to be reported; CCRPC will provide this	Appendix Section 4
5.b. Report 2025, 2035 and 2050 targets for energy use	X			Appendix Section 4
5.c. Evaluation of thermal-sector energy use changes	X			Pp. 33-34; Appendix Section 4
5.d. Evaluation of transportation-sector energy use changes	X			Pp. 34-35; Appendix Section 4
5.e. Evaluation of electric-sector energy use changes	X			Pp. 35-36; Appendix Section 4
6.a. Encourage conservation by individuals and organizations	X			Pp. 33-34; Energy Goal 2, Action 5; Goal 4, Action 5
6.b. Promote efficient buildings	X			P. 34; Energy Goal 2, Actions 1-3
6.c. Promote decreased use of fossil fuels for heat	X			Energy Goal 2, Actions 5 & 6
6.d. Demonstrate municipal leadership re: efficiency of municipal buildings?	X			Energy Goal 2, Action 2; Goal 4, Action 4
7.a. Promote shift away from single-occupancy vehicle trips / increased public transit use?	X			P. 34; Energy Goal 1, Actions 4 & 10; p. 72
7.b. Promote shift from gas/diesel to non-fossil fuel vehicles?	X			Pp. 33-34; Energy Goal 1, Actions 5-7
7.c Promote walking & biking infrastructure	X			P. 34; Energy Goal 1, Action 2
7.d. Demonstrate municipal leadership re: efficiency of municipal transportation?	X			P. 34; Energy Goal 1, Actions 8 & 9
8.a. Promote smart growth land use policies	X			P. 35; Energy Goal 1, Action 1

8.b. Strongly prioritize development in compact, mixed-use centers	X			P. 35; Energy Goal 1, Action 1
9.a. Report existing renewable energy generation	X			Appendix Section 4
9.b. Analyze generation potential	X			Appendix Section 4
9.c. Identify sufficient land to meet the 2050 generation targets	X			P. 35; Appendix Section 4
9.d. Ensure that local constraints do not prevent the generation targets from being met	X			P. 35; Appendix Section 4
9.e. Include policy statements on siting energy generation	X			Pp.35-36; Energy Goal 3, Action 2
9.f. Maximize potential for generation on preferred sites	X			Pp.35-36; Energy Goal 3, Action 3
9.g. Demonstrate municipal leadership re: deploying renewable energy	X			Energy Goal 3, Actions 4 & 7; Goal 4, Action 7
10. Equity Impact Assessment	X			P. 36, Energy Goal 4, Action 3
11. – 13.A-E, 14. Include maps provided by CCRPC or Municipality	X			Appendix Section 4
13.F. Forest Block Evaluation	X			Energy Goal 3, Action 2; Appendix Section 4, Table C3

Edits Required for CCRPC Determination of Enhanced Energy Plan Compliance:

1. Data on existing natural gas usage (to be provided by CCRPC) must be included to meet standard 5b, which requires plans to report current energy consumption in all sectors, including heating.

Proposed Motion & Next Steps:

The draft 2026 Richmond Town Plan most of the statutory requirements for CCRPC regional approval. Richmond staff will bring the required edits noted for plan approval and determination of enhanced energy plan compliance to the **Selectboard public hearing on _____**.

“I move that the Planning Advisory Committee recommend that the CCRPC Board grant regional approval, confirmation of the planning process, and determination of energy compliance to the 2026 Richmond Town Plan, pending edits by the Town of Richmond as recommended by CCRPC staff.”