**CCRPC Memo**

The purpose of this memo is to provide CCRPC feedback regarding the draft Future Land Use (FLU) map for Richmond with a due date by the end of May, 2025, as per discussions with Virginia Clarke, Chair Richmond Planning Commission.

It was not feasible given the timeline to get feedback from Town Committees such as the Richmond Conservation Commission (RCC) so a Working Group (WG) was put together to assemble a response. This group included:

Virginia Clarke – Chair Planning Commission

Brad Elliott – Richmond Land Trust (RLT), Andrews Forest Committee, frequent worker with Richmond Conserrvation Commission (RCC).

Bob Low: Member of RCC, have been on PC and DRB and did a lot of work on our 20018 Town Plan.

Wright Preston – RLT; Andrews Forest Committee

Judy Rosovsky, Chair RCC

For reasons of time, the working group focused on two categories: Rural Agriculture and Forestry Rural (RA) and also Rural Conservation (RC). It reviewed the descriptions provided with the map as well as the Methodology used in its development. Even at that, its conclusions need to be considered work in progress.

The WG noted that though the title of the map includes the word “future” it is based on the present with regard to RA and RG. It does not indicate where the Town might want to go for those areas. Better to call it Current Land Use map at least for them?

Based on the WG’s FLU and GIS-map based examination, together with its familiarity with ANR guidelines including (though not limited to) Vermont Conservation Design (VCD) and personal knowledge, the WG concluded that there are significant misfits between the designated categories and the description of them. The poster-child for this is the northeast corner of the Town. Here, much of the area is in Rural-Ag … (teal: RA) rather than Rural Conservation (Green: RC). Other regions suffer the same problem.

The WG believes that one reason for discrepancy is the use of Current Use (CR) parcels to map out RA. Current Use is not at all tagged to ANR / VCD, etc. priorities, such as connectivity, priority forest, highest priority natural areas, the description of the layer provided by CCRPC and the like. All Current Use is not equal in those regards.

A similar issue arises for use of Conserved Lands as an important determinant for the location of RC. For example, many Conserved Lands might not naturally fit into RC, due to their status as working lands. Even where there's no forestry or Ag practiced on them, they could be blanketed by trails and unamenable to wildlife, natural communities, etc. In terms of the future, Easements are tough to amend, though maybe not so much for changes to make them more restrictive.

A strategy the WG considered was to go in and re-label certain CU parcels such as those in the NE corner of the Town which the WG feels strongly should be in RC. That would come far closer for that area to fitting its provided description. Though achieving a visual representation of what the WG believes, this remains suspect as it depends on CU parcels rather than some better (though difficult) classification based on the description for RC. Furthermore, that mapping is parcel-based, while many important ANR features are not bounded by parcel maps.

The WG deem the best approach would be to use available VCD and other ANR / VGIS layers to map out RC. The WG would be prepared to assist in that effort, however that goal was not possible to accomplish given the limited timeline. The issue additionally came up as to whether the Town would be able to do so on its own for RA and RC given the current FLU map. That is, is the Town precluded from using such a strategy to develop its land use plan should the current FLU locations and descriptions for RA and RC remain?

The WG concluded given the acute timeline that it should rather identify general areas where RA / RC changes need to be considered. The next step would be to complete a detailed assessment of those areas to provide an evidence-based rationale for making change.

The attached FLU map has been overlaid with circles / ellipses identifying the areas that the WG feels need attention, most specifically requiring re-identification to include more RC coverage. These were selected considering ANR / VCD and like guidelines that need to be considered and mapped in detail. The basis of these choices lies in the mapped locations of ANR / VCD features including Highest Priority Forest Blocks, highest rated wildlife habitat, Habitat Connectors, Priority Natural and Species Communities and the like.

To illustrate its thinking and to use as an example, the WG notes the following as located within area-1.

* SW corner of Chitt. County Uplands Conservation Project;
* Lightly harvested under Forest Legacy protections;
* Pedestrian-only trails, posted glacial pond;
* Proximity to Winooski River;
* Highest priority core forest;
* Habitat Connectivity N-S, E-W;
* Contains VCD landscape- and community/species priority lands;
* Highest priority Natural Communities;
* Highest priority Species Communities;
* Highest priority Wildlife Habitat;
* Uncommon Natural Communities;
* Priority Wildlife Crossings;

Additional issues caught the attention of the Working Group in reviewing the draft FLU. These included:

* The WG has taken a quick look at the comments entered on the Interactive FLU map. Many simply indicate the identity of a location, what is there (e.g. Schools) and the like. Several point out conserved lands. Recommended action steps are not included.
* There would appear to be a meaningful discrepancy between State parcel maps and locally ones. If correct, how is that to be reconciled in terms of FLU mapping?
* State vs local conserved lands maps need to be reconciled at some point given Conserved Lands serve as a focus for the Rural-Conservation Layer.
* The Andrews Community Forest should be completely RC.
* As per recent legislation, should there be a separate riparian layer? This appears called for in Act-181 Methodology).

ECOS defines riparian corridor as follows.

***River Corridors****. A river corridor is the land area adjacent to a river that accommodates the dimensions, slope, planform, and buffer of the naturally stable channel, which is necessary for the natural maintenance or restoration of a dynamic equilibrium condition (as defined in 10 V.S.A. §1422), and for*

*minimizing fluvial erosion hazards.*

The Working Group looks forward to joining discussion regarding how best to proceed.

Respectfully and on behalf of the Group,

Bob Low

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