

**Public Comments Recived on Draft Amendments LDR-20-01
Comments through May 19, 2021**

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| 1 | Question/Comment | Source | Received | Subject | Type |
| 2 | 100 - foot setback vs. 50 - foot - what is the rational and what would be accomplished? Does not take into account the topography of the land, stormwater systems, etc.? | Jeff Nick | 3/3/2021 | Wetlands | Policy |
| 3 | Wetland regulations: Why is it necessary to have greater restrictions than the state mandates? The state rules are already different than the federal rules so this would create greater confusion. Will there be flexibility in allowing a certain percentage of class III wetland encroachment. Sometime a small sliver of wetlands can cause a big problem for a project that could normally proceed under the state regulations. | Jeff Nick | 3/3/2021 | Wetlands | Policy |
| 4 | For the town to have its own definition and rules for wetlands on top of federal and state rules again seems overly restrictive and confusing. This seems very unnecessary especially when it could negatively impact individual small lot property owners and impinge on their property rights. | Jeff Nick | 5/11/2021 | Wetlands | Policy |
| 5 | But why then were protection areas shown for wetlands? The same thing applies to wetlands as it does for riparian areas. They have to be field delineated. Moreover, wetlands are protected under state regulations, so, actually there is no need to show them on our maps. (I am not suggesting these protections be removed from the city maps. Personally, the more protections we show for natural resources, the better. I'm just pointing out what appears to be an inconsistency.) If both wetlands and riparians areas have to be field delineated, why is one category of water resources shown as protected on the map and not the other? What was the rationale for showing wetland areas on the map (which are protected by the State) but not riparians areas (which are not protected by the State)? | Rosanne Greco | 4/23/2021 | Wetlands | Policy |
| 6 | Speaking of wetlands. The new maps show a much larger area of wetlands than the previous maps. Did someone walk the land and discover that we had grossly under-shown the wetland areas on the prior maps? And, if there was a field delineation done for the wetland areas, why was it not done for riparians areas at the same time? Both are incredibly important natural resources. | Rosanne Greco | 4/23/2021 | Wetlands | Policy |
| 7 | Wetland/Riparian buffers – More of the same concerns under floodplains. If the state isn't requiring SB to make these changes, then why are they being done? These appear targeted to large parcel owners and not to the local Zoning Administrator enforcement, although that is a first concern. The Vermont thing to do is to be talking with the various (and few) large parcel owners first before telling them what they can and cannot do. This practice is often omitted in a rush-to-judgement. | Chris Shaw | 5/3/2021 | Wetlands | Policy |
| 8 | My general concern is that expanding the buffer around Class II wetlands from 50' to 100' and decreasing the size of exempted Class III wetlands from ½ acre to only 300 sq. ft. are changes that skew the already delicate balance between conservation and development. The new proposed LDRs are already removing almost 950 acres from potential development via adoption of the Arrowwood "habitat block" concept, and adding 50' to the width of wetland buffers will remove a significant amount of additional acreage. It is easy to argue that wider buffers benefit wetland flora and fauna, but the undesirable side effect is that development must be squeezed into smaller plots, which often limits the diversity of building types that the new PUD standards are designed to provide. It is not clear why South Burlington needs to be an outlier in Chittenden County, where no other city or town requires wider buffers or smaller Class III wetland sizes than are specified in the Vermont Wetlands Rules. It also isn't clear why the new LDRs propose a different standard for residential development than for commercial. Are houses more threatening to wetlands than office buildings? My understanding is that both are subject to the same regulations around pesticides, fertilizers, etc. if they are close to wetlands. | Alan Long | 5/3/2021 | Wetlands | Policy |
| 9 | A couple of your members toured our property on Spear Street last week and reminded the other members of the importance of site visits to assess the effects of the LDRs in real-life situations. In our particular case, for example, though we await an "official" wetlands certification, preliminary findings suggest that there are two narrow "fingers" of possible Class II wetland that extend close to or even into our proposed development. For these fingers, which are approximately 50' wide, adding 100' of buffer on each side will create two undevelopable swaths 250' wide. Certainly a buffer doesn't need to be four times as wide as the wetland finger it's protecting, and I would hope that the PC could reconsider its proposal for the wider buffer, at least in the case of narrow fingers like these. It is also worth noting that one of the fingers on our plan crosses the right of way for a road connection and a bicycle path that the City has long anticipated as connections between the adjacent developments, South Village to the south and South Pointe to the north. Would those connections now be prohibited? | Alan Long | 5/3/2021 | Wetlands | Policy |
| 10 | Our family has been responsible stewards of the property on Spear Street for 70 years now; the development we're proposing will continue to conserve 22 of our 39 acres under the 2006 NRP statute and another ~6 acres of Arrowwood habitat block. Expanded buffers and recategorized Class III wetlands would restrict even more acreage. I hope that the Commission will reconsider these overly restrictive new regulations for wetlands. Their negative effects on responsible development far outweigh their positive attributes. | Alan Long | 5/3/2021 | Wetlands | Policy |

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| 11 | Mr. Long thanked Ms. Ostby and Mr. Engels for coming to look at the Long property. They are planning to develop the 39 acres they own on Spear Street. 22 of those acres are already conserved. The new regulations take away 6 more acres, and they are concerned that with the wetland buffer increase, they will lose value of their property. He cited the need to have a balance as there is also a citywide need for housing. There has been a decrease of 55,000 people under the age of 25 in Vermont. The state now has the 3 rd "oldest population" in the country. There is a need for young people to stay in Vermont. He could not understand why South Burlington has to have wider buffers than the State regulations. | Alan Long | 4/27/2021 | Wetlands | Policy |
| 12 | Mr. O'Brien stressed that he does not like to fill wetlands. The intent should be to have the new LDRs fall in line with the regulations in other layers of the process. He noted that Vermont wetland rules don't taken Class 3 wetlands under their jurisdiction. The Army Corps of Engineers doesn't require buffers even around a Class 2 wetland. The State used to regulate Class 3 wetlands but stopped because their realized that so much of state land would qualify as Class 3. He noted that you can technically have a Class 3 wetland on your front lawn. He felt the City should align with the State or Federal requirements. The Federal requirements allow up to ½ acre which is more meaningful than 300 sq. ft. Mr. O'Brien said, "300 square feet is ridiculous." He also noted that it won't be possible to get verification of a delineation, and the DRB will ask for that and have to hire someone to do it. Mr. O'Brien said an area starts to function as a wetland at half an acre. He also noted that if you are close to that half acre, you have to have the State come out. | Patrick O'Brien | 5/4/2021 | Wetlands | Policy |
| 13 | Mr. O'Brien noted that had testified in Montpelier as to whether to allow for stormwater treatment in buffer zones. He urged that all buffer zones be treated the same, and that if the 100-foot buffer is kept, to allow for stormwater treatment in the buffers. | Patrick O'Brien | 5/4/2021 | Wetlands | Policy |
| 14 | Mr. O'Brien also said he understands the need to allow farming to continue and noted that farming is regulated/allowed under different wetland rules. He asked the Commission not to handicap the DRB so it can't allow farming in a wetland or in open space areas in the future as this could lead to unintended consequences. | Patrick O'Brien | 5/4/2021 | Wetlands | Policy |
| 15 | it would be great to get some tweaks in the regulations so they would be more in line. He said that in a perfect world, the LDRs would mimic the rules of the State, Reds, and Army Corps of Engineers. He specifically noted that under the 500-year flood plain regulations regarding steep slopes, the Commission is allowing clarification by the applicant via Lidar data instead of an on-ground survey. Mr. O'Brien said he has found Lidar to be inadequate. An on-ground survey would bring in another level of accuracy. | Patrick O'Brien | 5/4/2021 | Steep Slopes | Policy |
| 16 | Infrastructure encroachment: Would the new regulations prevent, or allow a party to appeal, a future project such as Swift Street extension and Exit 12B? | Jeff Nick | 3/3/2021 | Restricted Infrastructure | Policy |
| 17 | Additionally provisions should be included in the PUD/LDR's that make it clear that future infrastructure projects such as roads, bike paths, utility easements, etc., will be allowed to be built across habitat and forest blocks without the threat of a permit appeal. | Jeff Nick | 5/11/2021 | Restricted Infrastructure | Policy |
| 18 | The narrative of Article 12 says (in a general sort of way) roads through wetlands are permitted if they are necessary and there is a plan to mitigate damage. Is this really correct? The narrative of Article 12 says (in a general sort of way) roads through wetlands are permitted if they are necessary and there is a plan to mitigate damage. Is this really correct? | Loretta Marriott | 4/30/2021 | Restricted Infrastructure | Policy |
| 19 | Ms. Marriott said the road goes through a wetland and crosses Potash Brook. She asked if that is permitted. She wondered how that fit with the regulations. | Loretta Marriott | 5/4/2021 | Restricted Infrastructure | Policy |
| 20 | Invasive species may be removed in any situation? | Jeff Nick | 3/3/2021 | Habitat Blocks-Connectors | Policy |
| 21 | Will private land ownership be restricted for forest blocks and habitat areas? What are the impacts to activities like kids playing in the woods, tree houses, leaf piles, composting, climbing ropes in trees, removal of rotten trees, etc. (discuss Deer Run neighborhood in Shelburne experience with Trees and habitat) | Jeff Nick | 3/3/2021 | Habitat Blocks-Connectors | Policy |
| 22 | May any portion of a habitat or forest block be developed? This is especially important if it represent a significant portion of the entire lot. | Jeff Nick | 3/3/2021 | Habitat Blocks-Connectors | Policy |
| 23 | It is not apparent that Article 12 reflects the designation of types of buffers (or does it have much narrower buffers?) for habitat blocks. | Ray Gonda, NRCC | 3/3/2021 | Habitat Blocks-Connectors | Policy |
| 24 | Do the draft regs provide protection for the valuable buffer areas highlighted by the IZ-commissioned report from Arrowwood? | Rosanne Greco | 4/1/2021 | Habitat Blocks-Connectors | Policy |
| 25 | Do the habitat blocks align with those identified in the Arrowwood report? | Rosanne Greco | 4/1/2021 | Habitat Blocks-Connectors | Policy |
| 26 | What was the reason for deleting the words "conservation areas shown in the Comprehensive Plan" from the draft regs. These areas are referenced in the current LDRs. | Rosanne Greco | 4/1/2021 | Habitat Blocks-Connectors | Policy |

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| 27 | The definition of Habitat Block from the draft LDR amendments dated March 11, 2021 stating: "Contiguous forested areas and adjacent unmanaged shrubby areas of old field, young forest and unmanaged wetlands as demarked on the Natural Resources map" is extremely concerning. Does this mean the boundaries of the natural resources map will be expanded to capture this broader definition? As a corollary to this concern it seems counter intuitive to encourage habitat along the interstate corridor for obvious reasons. | Jeff Nick | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 28 | The PUD regulations should allow for some development within forest blocks especially those properties with large percentage of forested areas. Otherwise, overly restrictive regulations could be seen as a taking. | Jeff Nick | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 29 | To prevent individual homeowners from owning woodlands and instead demand that these areas be held in common seems counter to individual property rights. Surely the town can trust each homeowner to be responsible owners of mature trees especially if the house lots include ample open yard space. | Jeff Nick | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 30 | Specifically, for the Hill Farm at 835 Hinesburg Rd., the Environmental Hazards level 1 map does not conform with what is actually on the ground and appears to be instead an attempt to block a future interstate exit if that idea were to move forward. | Jeff Nick | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 31 | I am disappointed in the Planning Commission's assessment of the Forest Habitat Blocks identified in the Arrowwood Environmental LLC report. The review of 20 blocks during working sessions on September 29 and October 13, 2020 seemed biased in favor of land development rather than looking at the value for conservation, habitat and open space. working sessions on September 29 and October 13, 2020 seemed biased in favor of land development rather than looking at the value for conservation, habitat and open space. The Forest Blocks reviewed were identified by using two different shades of green: dark green for "core"; light green for "buffer". The "buffer" used was 100 meters (300 feet) and was subtracted from the Arrowwood block. Using two shades of green creates two different "values" of forest block- "important" and "not so important"-in place of the single shade of green used by Arrowwood. | Francis MacDonald | 5/3/2021 | Habitat Blocks-Connectors | Policy |
| 32 | Also, the concept of "buffer" has taken on two different meanings depending on who is interpreting the value of the Forest Block. The Arrowwood report first uses "buffer" as a "ranking" parameter to compare blocks in order of importance by comparing the size of the core with the size of the outer 300 feet. A large roundish block has a higher rating than a long thin block. In a March 26, 2021 letter to the City Council and Planning Commission, Arrowwood adds clarification and indicates a "buffer" as "undeveloped lands adjacent to habitat blocks". And states that "these adjacent lands serve to add wildlife value to the mapped blocks". This would indicate a "buffer" area be used as an <u>addition</u> to the outer edge of the block. The Planning Commission uses "buffer" as a 300-foot <u>subtraction</u> from the identified block reducing the size and importance of areas within the block. And as a tool for "lopping off" or removing areas of the originally identified habitat area. | Francis MacDonald | 5/3/2021 | Habitat Blocks-Connectors | Policy |
| 33 | During the review of the 20 blocks, the phrase "is this change likely to affect development?" was often heard. In those areas where "it is not likely to affect development", the buffer was kept. In areas where "this land is suitable for development", the buffer was removed. | Francis MacDonald | 5/3/2021 | Habitat Blocks-Connectors | Policy |
| 34 | In the evaluation of the 20 blocks, 9 blocks had sections removed allowing development, and in 11 blocks no changes were made. In many of these 11, other restrictions such as steep slopes, river corridor or flood plain were also present. The following are three examples where protections were removed by "lopping off" the light green "buffer" area in favor of development: 1. 1720/1730 Spear St – Property between South Pointe and South Village: A "light green" forested buffer was removed to allow development of 49 homes. 2. Wheeler/Hill Farm – "Light green" buffer areas with trees and shrub were removed to "straighten the demarcation" and allow future development. 3. Meadowland – A large "light green" buffer of shrub and grassland was removed to allow future development. During these discussions, the commissioners seemed to be advocating for development rather than for wildlife habitat and open space. This seems contrary to the intent of Interim Zoning where the City paused development to identify and protect open space and natural resource wildlife habitat. | Frani | 5/3/2021 | Habitat Blocks-Connectors | Policy |
| 35 | Habitat blocks/habitat connectors – Be mindful of the 2003 Arrowhead study that supported NRP protections and resulted in a 10 year battle with JAM over golf course homes -- costing the City 7 acres of the 3 rd highest ridgeline in town in exchange for 21 acres of unmitigated stormwater swamp that JAM could absolve itself of responsibility for. Long litigation and contention with large parcel owners may not always end well. The protections are for what exactly? Mammals, reptiles, birds, or all of them? For this level of categorization, there should be an explicit determination of whether 5 flocks of turkeys are worth the potential living space of 50 human mammals. 50 humans commuting from Georgia displace as much wildlife there, if not more, and contribute vastly more to the degradation of the planet. Marking sightings on the map ignores that humans can cohabit with turkeys – many big cities see turkeys and coyotes in their streets now (especially during the reduced traffic times of the pandemic quarantine) – coexistence works. South Burlington shouldn't treat habitat as a zero sum scenario; we've created sufficient public, park and open space to achieve balanced goals. This step encourages further destruction of Vermont's unique landscape, settings, and lifestyles in outer towns that have not managed their planning and zoning as well as South Burlington. Worry that this is a selected sampling that misses the larger discussion of what value humans have for living space within the same realm – is there a specific level at which animals become more important – what is that level (acreage per animal? Population count of animal?)? Humans have learned to live with less space and most animals have shown the same ability. Unlike cars, is it harmful to push a percentage of the less-adaptable animals/habitat to other towns? These aren't the same issues of social inequity that are involved as when SB plans to limit development beyond its present practical limits and pushes humans, rather than animals, to other towns. | Chris Shaw | 5/3/2021 | Habitat Blocks-Connectors | Policy |

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| 36 | §12.01 (A): This section states that “[w]here there is conflict between subdivision or planned unit development standards, and the standards in this article, the standard that imposes the greater restriction shall apply.” To the extent that the Planning Commission (PC) is relying on the Planned Unit Development (PUD) standards to provide relief from the adverse consequences of the prohibition against any development within Habitat Blocks, this removes the PUD standards as a source for relief. See additional comments on PUD provisions below. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 37 | §12.01(C)(1): UVM has requested guidance from the City on its interpretation of how §4413 restricts the Development Review Board’s (DRB) review of UVM applications, particularly the applicability of Article 12 and the Habitat Block standards. Some understanding of the City’s position is critical to UVM’s consideration of the Environmental Protection Standards and how they will restrict its ability to use its lands within South Burlington. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Technical |
| 38 | §12.01(D): As discussed in more detail in comments below, the PUD standards are not currently available for several of the UVM parcels most affected by the Habitat Block restrictions since PUD review does not apply in the I-A district. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 39 | 7. §12.05(B): As shown on the Natural Resources Map, Habitat Blocks cover nearly 100% of the following UVM parcels: a. Centennial Woods/Patchen Road Parcel - 87 acres b. Edlund/Martin Parcel – 44 acres c. East Woods – 50 acres Hazards, Level 1 and II Resources, Habitat Blocks, and Habitat Connectors cover significant portions of several other UVM parcels, including the Wheelock West and UVM Farm parcels. How would the presence of extensive coverage of a parcel by a Habitat Block affect the applications of the LDRs requirements for density, lot coverage, building coverage, setbacks, and other dimensional requirements? UVM parcels in the I-A district are not entitled to PUD consideration, which would allow some flexibility in the application of these standards. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 40 | §12.05(B)(3): This section refers to Conservation Planned Unit Developments, which would not exist under the LDRs with the proposed amendments. UVM understands that the PC has deferred discussion of modifications to the PUD standards until after it has completed its work on the Environmental Protection Standards (EPS). This deprives UVM of the relief from the adverse impacts of the Habitat Block restrictions that it has been relying on in prior conversations with the City and the PC. Consideration of the EPS without the modifications to the PUD standards puts UVM in an impossible position. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 41 | §12.05(D): This section allows modifications to mapped Habitat Blocks as one form of relief from the Habitat Block restrictions. The modification option, however, is not available under certain circumstances. “Land located within the SEQ-NRP zoning subdistrict, Hazards, Level I resources, previously approved as open space or conserved land, subject to a deed restriction prohibiting development, subject to a conservation or density reduction easement, or owned by a public entity shall not be eligible for any of the modification methods for habitat blocks subject to this section.” (Emphasis added) We would assume that UVM would be considered a “public entity”, and not eligible for this relief. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 42 | 10. §12.05(E): This section provides relief for parcels containing a combination of Hazards and Level I Resources exceeding 70% of the total lot area, which would apply to at least three of the UVM parcels. UVM has several concerns about this provision: a. Under (2), the DRB “may” approve exclusion of land within the Habitat Block “not to exceed” 30% of the total lot area. This relief is entirely discretionary. Although it provides priorities for lands to be excluded, it contains no standard for the DRB to apply in deciding whether to exclude any land or, if it does decide to exclude land, how much up to the 30% maximum. If the intent is to have the DRB use the “undue adverse effects” standard based on §12.01(A), that should be made clear. For the reasons contained in the discussion of §3.04(H) above, the undue adverse effect standard provides little comfort or predictability for owners with large Habitat Blocks, like UVM. b. It contains standards and terms that are subjective and undefined: i. Since Habitat Blocks are defined as Level I Resources, this first priority would not allow the exclusion of any land. ii. UVM agrees with the note indicating that “not characterized by a preponderance of mature trees” requires definition. iii. Is “Core Habitat Block” defined? c. Subsection (b) Special Circumstances contains a vague reference to an exclusion that “does not allow for a unified PUD consistent with the purposes of these regulations”. As discussed elsewhere in these comments, the PUD standards are not available for the UVM parcels most affected by the Habitat Block restrictions. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 43 | §12.05(F): The general standard for Habitat Blocks is that “all lands within a Habitat Block must be left in an undisturbed, naturally vegetated condition”. Particularly for the UVM parcels with 100% or near-100% coverage by Habitat Blocks, this removes all development potential for the parcel. | UVM | 5/11/2021 | Habitat Blocks-Connectors | Policy |
| 44 | Mr. Nick said the definition of a habitat block is also very broad. He noted that what is identified as a habitat block on his land is not. | Jeff Nick | 5/4/2021 | Habitat Blocks-Connectors | Policy |
| 45 | Mr. F. MacDonald questioned the procedures used for habitat blocks. He was disappointed that the buffer was subtracted from the block when typically the block is increased by the buffer. It seemed to him that the buffer was removed if the area was OK for development. He cited 3 specific blocks (near South Village, Hill Farm and Meadowland which are all planned for development. | Francis MacDonald | 5/4/2021 | Habitat Blocks-Connectors | Policy |
| 46 | Mr. Nick also noted that habitat blocks don’t follow the edge of the forest on his land. Mr. Nick noted they just removed some invasives at the edges of the field, and that may be why they are showing up. He asked that corrections be made. | Jeff Nick | 5/4/2021 | Habitat Blocks-Connectors | Technical |

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| 47 | . Mr. Nick said the habitat blocks seem to him like a “taking.” | Jeff Nick | 5/4/2021 | Habitat Blocks-Connectors | Policy |
| 48 | Revert to Habitat Block Mapping Identified by Arrowwood for 3 Critical Areas. Arrowwood mapped the forested habitat blocks in the City. Arrowwood defined a habitat block for this purpose as “contiguous forested and adjacent unmanaged shrubby areas of old field, young forest, and unmanaged wetland.” In reviews that were undertaken in September and October of 2020, the planning commission decided to eliminate some portions of these habitat blocks. Three of the revisions (circled in red on Attachment B) seem inappropriate: 1. 1720/1730 Spear Street: There was a fairly substantial, forested area at 1720/1730 Spear Street that was removed from habitat block protection (see red circled area in Attachment C). This forest is part of the Great Swamp habitat, which was found by Arrowwood to be part of the most important habitat block in the City of South Burlington. I also understand from neighbors that this area is frequented by coyotes and bobcats. If this is not prime habitat that deserves protection, what does? 2. Meadowlands Area: A portion of shrub and grassland in the Meadowlands area was removed “to allow for future development”. Staff described the area removed as “not really a forested area”. But, it was recently a forested area (see Attachment D which shows the same area as of 2006 – from Google Earth). It would be perverse to reward a developer for cutting down a forest prior to your review. Presumably the forest would grow back if not bulldozed! Even in its current state, Arrowwood included these shrub areas in the habitat blocks on the basis that “early and mid-successional old-fields ... are known to contribute, and are probably critical, to South Burlington’s current wildlife diversity.” 3. Wheeler/Hill Farm Area: – a shrub area adjacent to the forest was removed because there seemed to not be trees under the area removed and staff suggested to “tilt the balance” to a future neighborhood. But, as above, these shrub areas were found by Arrowwood to be “probably critical” to South Burlington’s current wildlife diversity. Why hire experts to provide advice on what is critical to achieve the City’s natural resource goals if that advice is disregarded? | Andrew Chalnick | 5/16/2021 | Habitat Blocks-Connectors | Policy |
| 49 | B. Add Buffers around Habitat Blocks. The 2020 study prepared by Arrowwood recommends protecting “supporting habitat” around the habitat blocks. Arrowwood states that the supporting habitats “function as a buffer, or padding from human disturbance around the [habitat block] and provide additional area wildlife use to fulfill their requirements, venturing into them for food, and to a lesser degree cover, space and water. In South Burlington, supporting habitats are notable for their ability to function as habitat for prey-base species, such as rabbits, rodents, and turkey, which contribute to the survival of wider-ranging wildlife occupying the [habitat blocks]”. In their presentation to the City Council, Arrowwood said “supporting habitat plays a big part in the success of the habitat blocks”. To clarify the importance of the supporting habitat, Jeff Parsons, a managing partner with Arrowwood, has submitted to the City a supplemental letter concluding that “providing buffers to habitat blocks goes a long way towards ensuring the success of South Burlington’s habitat blocks in enhancing wildlife diversity and populations within the town.” The regulations should be revised consistent with Arrowwood’s conclusions and provide for some buffer around the habitat blocks. | Andrew Chalnick | 5/16/2021 | Habitat Blocks-Connectors | Policy |
| 50 | I noticed the Habitat Block on the Hill Farm, as identified in the Arrowwood study, was cut back by the latest draft of the proposed LDR amendments. And I have personally noticed many trees and shrubs have been removed from the Hill Property quite recently during the late winter and spring months. We not only need to protect the Habitat Blocks as identified by the experts, but also heed their advice and create the necessary buffers so these blocks can work as planned. I urge you to please revert to the Habitat Block mapping performed by Arrowwood and add a buffer around the mapped block. | Nick Mancuso | 5/19/2021 | Habitat Blocks-Connectors | Policy |
| 51 | After carefully reading the proposed Article 12, I am concerned that there is no mention of, or protection for, grasslands. While I am aware that grasslands do not compromise a significant portion of the city, shouldn’t even a small amount of this important habitat warrant protection? It would seem that the smallest important habitats, which are at the greatest risk, should receive a voice and maximum protection so they do not disappear forever. | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |

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| 52 | On March 29 th , 2021 VPR had a wonderful interview with Scott Weidensaul. He is a leading naturalist who has written over thirty books and has spent decades studying migratory birds. Mr. Weidensaul shared that since 1970, 30% of North American birds have disappeared totaling more than an astounding 3 billion. Even with that staggering number, he was hopeful. At the end of the interview he stated, “and, so for the groups of birds in North America that are in the worst shape today, like grassland birds - species like meadowlarks and bobolinks and upland sandpipers – that depend on natural grasslands, if we did the same thing for grasslands that we did for wetlands, we can bring those birds back. So, I mean, there are ways that we can turn this around. We just need to have the political will and the wherewithal to make it happen.” What he was referring to, with regards to wetlands, was the dramatic increase in water fowl and water birds over the last 40 years because “starting in the 1980’s, we as a society poured a tremendous amount of money and political will into restoring and protecting wetland habitats.” | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |
| 53 | Here in our own backyard, in 2004, the city commissioned a study of breeding birds in the SEQ prepared by Wings Environmental. The study also cites widespread threats to grasslands and their inhabitants, and suggested that grasslands should have the highest conservation priority in the SEQ. The 2016 Biofinder Update Report states the ecological importance of grasslands (and shrublands) “whether of natural origin or resulting from active land management, are critical to the survival of a suite of bird species in Vermont.” Additionally, “with conversion of natural grasslands elsewhere in the Northeast and especially the Midwest has led to the decline of grassland birds in their historic natural habitats. This has given Vermont, and the Northeast in general, greater importance for the conservation of grassland birds. The North American Bird Conservation Initiative (NABCI) has designated grassland birds as a priority suite of species in Vermont.” | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |
| 54 | The Wildlife Heritage Foundation describes Grasslands as “globally important because they are a natural <i>Carbon Sink</i> and natural carbon sinks are an important part of a natural process called <i>Carbon Cycle</i> . In the carbon cycle, earth both emits and re-captures and stores large quantities of carbon dioxide, also known as CO2, from the earth’s atmosphere thereby keeping the global temperature more or less in balance.” Now more than ever this is critically important. Natural carbon sequestration cannot be replaced. | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |
| 55 | The U.S. Forest Service states that grasslands “also deliver other important services that are often perceived to be free and limitless. Taken for granted as public benefits, ecosystem services lack a formal market and are traditionally absent from society’s balance sheet. As a result, their critical contributions are overlooked in public, corporate, and individual decision-making. The Forest Service is working to promote public awareness of the importance of forests and grasslands to human well-being.” | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |
| 56 | Just in today’s Vermont news, Bald Eagles will soon soar off the endangered species list. Margaret Fowle, a conservation biologist with Audobon Vermont also added this to the discussion: “And that’s not the only species [of concern] out there ... grassland birds are declining, shrub land birds are declining. So, there’s lots to think about. But it’s basically going to come down to making sure there’s enough habitat for these birds, as well as making sure some of the impacts, like chemical impacts, aren’t there.” The bald eagle’s story is a hopeful message that humans can undo damage to nature. It’s also a reminder of our continuing impact on other species. | Alyson Chalnick | 4/26/2021 | Grasslands | Policy |
| 57 | Ms. Dopp was concerned that grasslands don’t seem to be adequately addressed in the regulations. | Sarah Dopp | 4/27/2021 | Grasslands | Policy |
| 58 | Ms. Dooley noted that there was a statement made at a different committee that technically there are no grasslands in Vermont. Mr. Strong said that is incorrect. | Sandy Dooley | 4/27/2021 | Grasslands | Policy |
| 59 | The draft regulations presently provide no explicit protections for these resources and the LDRs should protect these important resources City wide, and not just in the SEQ. Grasslands. The 2014 report prepared by the South Burlington Open Space Committee notes that “endangered, threatened and rare or uncommon bird species rely on [grasslands] for their survival, including the Upland Sandpiper, Grasshopper Sparrow, Sedge Wren, Vesper Sparrow, Savannah Sparrow, Bobolink and Eastern Meadowlark.” The 2016 Biofinder report from the Vermont Agency of Natural Resources states that “most of Vermont’s grassland habitats occur in the Champlain Valley “and “[g]rasslands and shrublands, whether of natural origin or resulting from active land management, are critical to the survival of a suite of bird species in Vermont. Most of these species will continue to decline in Vermont if grassland habitat is not maintained.” Arrowwood should be asked to map the Grassland habitat (and potential grassland habitat) Citywide -- similar to how it was asked to map the forested habitat blocks -- and these areas should be protected. | Andrew Chalnick | 5/16/2021 | Grasslands | Policy |
| 60 | Include an Executive Summary written in lay terms for each Article which states the goals for the Article and how the Article achieves those goals. | SBLT | 2/17/2021 | General | Technical |
| 61 | Re-draft the Articles using non-technical and straightforward language; or add a supplemental layperson version—similar to what is now required with other explanatory documents dealing with legal and medical matters. | SBLT | 2/17/2021 | General | Technical |

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| 62 | Include a graphic or photo of selected parcels of land which depicts what the proposed language would allow. For example, give one or two examples of properties which could be developed using these new regulations, and how these properties would look if maximally developed under Article 12 and 15. | SBLT | 2/17/2021 | General | Technical |
| 63 | Spell out all acronyms before first using them, and include a glossary with these commonly used acronyms and terms. | SBLT | 2/17/2021 | General | Technical |
| 64 | Do the articles result in more land being conserved? Where is this land? | SBLT | 2/17/2021 | General | Policy |
| 65 | Do the articles list stronger environmental protections? What are these measures? | SBLT | 2/17/2021 | General | Policy |
| 66 | Will all of the future developments in the SEQ be conservation PUDs? It would seem appropriate and in agreement with the Comp Plan and the intent of IZ for any development in the SEQ to be a conservation PUD. The Comp Plan (and the residents) want the SEQ to be, in large part, conserved. | Rosanne Greco | 4/1/2021 | General | Policy |
| 67 | First and foremost the proposed regulations are exceeding complex and will likely lead to future litigation when permits are appealed or development proposals are either denied or approved with extremely restrictive conditions. | Jeff Nick | 5/11/2021 | General | Policy |
| 68 | Secondly, the mapping for forest blocks, habitat, and wetlands do not always follow the actual boundaries on the ground. Therefore, to avoid confusion, I would urge the city to be more precise in the delineation of these areas and allow applicants to bring in their own expert testimony when defining these boundaries. | Jeff Nick | 5/11/2021 | General | Policy |
| 69 | These are some of my concerns that I wanted to have on the record. While the PUD regulations seem encouraging as they relate different areas of South Burlington and specifically to the Hill Farm, the LDR's appear overly restrictive. On a regional level the restrictive LDR's could easily result in numerous unintended consequences as development leapfrogs over South Burlington to more rural locations resulting in sprawl and greater traffic. Given South Burlington's location and Chittenden county's future growth it seems that smart land use policies should encourage growth closer to employment and commercial centers as well as the interstate. | Jeff Nick | 5/11/2021 | General | Policy |
| 70 | Balance: the proposed rules balance two objectives essential to sustaining the City's vitality - conservation & growth. | Aff Housing Com | 4/2/2021 | General | Policy |
| 71 | Clarity and Goal Alignment: the proposed rules make clear (1) where and how natural resources are to be protected and (2) that new residential developments shall include elements demonstrated to support healthy neighborhoods, including compact development, which uses less land. | Aff Housing Com | 4/2/2021 | General | Policy |
| 72 | Inclusion and Diversity: requiring multiple housing types produces homes that vary in design and price, thus, increasing opportunities for households with varying incomes to live throughout the City; inclusionary zoning also increases the variation in housing prices. | Aff Housing Com | 4/2/2021 | General | Policy |
| 73 | Stability and Permanence: inclusionary zoning brings stability to households having lesser means because they can count on "forever" affordable rents or mortgage payments; this improves their quality of life. Inclusionary zoning's perpetual affordability requirement adds to the stability of the City's housing stock, thus improving the quality of life in the City, overall. Because inclusionary housing units are perpetually affordable, when they change hands, they are not transformed into high-priced units or short-term rentals. The proposed rules incorporate inclusionary housing units without increasing density. | Aff Housing Com | 4/2/2021 | General | Policy |
| 74 | Population and Property Tax Revenue Growth: the proposed density minimums are consistent with the proposed PUD-defined neighborhood development patterns; they also promote housing that requires less land per unit, thus decreasing the per unit cost of land while preserving more space and natural resources. Young families are more likely to be able to afford and be attracted to the neighborhoods that the proposed density minimums and PUD regulations produce. These neighborhoods are anticipated to accommodate population growth. In addition, more dense development generates more property tax revenue and is less costly in terms of roads, water, sewer, and utility services and their maintenance. With respect to property tax revenue, a five-acre neighborhood developed on the basis of two units per acre with average assessed value of \$600,000 per unit adds \$6,000,000 to the Grand List. A five-acre neighborhood developed on the basis of four units per acre with an average assessed value of \$375,000 per unit adds \$7,500,000 to the Grand List. | Aff Housing Com | 4/2/2021 | General | Policy |
| 75 | While the Planning Commission has done a careful and professional job on the draft LDRs, and the volunteers on the commission deserve our respect and thanks for their hard work and dedication, the current drafts of Articles 10 and 12 unfortunately do not adequately address those concerns, and need to be modified before the end of IZ to provide more protection for South Burlington's natural resources, including buffers around the habitat blocks, and protection for rare grasslands and vanishing farmlands. How much of South Burlington's remaining natural resources should be protected, and how much should be developed? What is the right balance? It's pretty clear we have already consumed most of South Burlington's natural resources, and "balance" was likely achieved some time ago. | Andrew Chalnick | 4/4/2021 | General | Policy |

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| 76 | Economic development, jobs and housing in the City should then be focused on infill and re-development of the failing commercial areas around City Center. With online shopping, commercial retail will continue to decline. Re-purposing failing commercial areas is a win-win for the environment and the economy, and can provide dynamic and attractive housing opportunities for people across all income levels. "Case Studies in Retrofitting Suburbia: Urban Design Strategies for Urgent Challenges" (2021) by June Williamson and Ellen Dunham-Jones describes how defunct shopping malls, parking lots, and other obsolete suburban development patterns across the country are being retrofitted to address current urgent challenges they weren't designed for: improving public health, increasing resilience in the face of climate change, leveraging social capital for equity, supporting an aging society, competing for jobs, and disrupting automobile dependence. | Andrew Chalnick | 4/4/2021 | General | Policy |
| 77 | Given that the latest draft was posted late last month, we do not feel we have had enough time to fully review and provide comment to the Planning Commission. Further, without the Commission completing its work on the PUD Standards, it is very difficult to have a full understanding of what the impact on our land will be should the Environmental Protection Standards move forward separately from the PUD standards. | UVM | 4/6/2021 | General | Technical |
| 78 | Ideally, if we want to address an issue (intended or otherwise) we would like the opportunity to give feedback prior to a completed draft going through the public hearing process. This will save time and effort in that the public hearing will address a more rounded and well-reviewed product. | UVM | 4/6/2021 | General | Technical |
| 79 | UVM requests that the Planning Commission delay the public hearing for the draft Environmental Protection Standards until we can see these together with the new proposed PUD standards. This will give the Commission, the University and others more complete information and the ability to review this more comprehensively as an interrelated package of new regulations. | UVM | 4/6/2021 | General | Technical |
| 80 | Unless I am mis-interpreting the maps (it's hard to assess acreage from the maps), it appears that most of the newly protected 974 acres are the city parks: Red Rocks, Veterans, Eastwoods, Centennial, Symansky, etc. Am I reading the map correctly? Certainly you are not counting the acreage in our city parklands as part of the 974 newly protected land. So, would you please tell me where I could find on the map the 974 acres that are protected? | Rosanne Greco | 4/22/2021 | General | Technical |
| 81 | How much of the 142 newly protected acreage in the SEQ is formerly developable land? The MAIN reason that the residents asked the city to conserve land was to protect rural lands in the SEQ from turning into housing developments. Therefore, would you please tell me how many acres of land there are in the SEQ that could have been turned into housing under the old LDRs but are now protected under the new draft LDRs? Also, where can I find them on the map? | Rosanne Greco | 4/22/2021 | General | Technical |
| 82 | At the map training session on Wednesday, I asked why some of the riparian areas, which were protected under the old LDRs are no longer protected under the new LDRs (the map showed them as unprotected). Monica said it was because anyone who wanted to develop in those areas would have to do a field delineation; so therefore, riparian areas didn't need to be shown as protected on the map. I take that to mean, someone would have to physically walk around the area to see if there were riparian areas present. And ... if riparian areas did exist—even though they are not listed on the map, then they could not build in that area. I think what Monica was saying, in other words, was that reality rules...not the map. Do I have that correct? But how would a developer know they couldn't build there? | Rosanne Greco | 4/23/2021 | General | Policy |
| 83 | I spent time looking at the slides (maps) that you sent. I've come to the conclusion that the technology is hindering the understanding of some basic, fundamental facts. The many layers and colors and acronyms make it very complicated. I know you and the Commissioners are very familiar with all of this, as you have been working on it for years. There are zoning and topology terms that you all probably take for granted; but, for the general public, I fear the text will be unintelligible, and the current interactive maps won't help very much. That is why I tried to ask—what I thought were simple questions requiring "yes or no" responses; such as "Are there any riparian area which were once protected, but are no longer protected?" I confess that I don't know enough about the various waterways to know how your response on river banks relates to my question. Or Monica's response that a field delineation will make sure riparians areas won't be disturbed by housing developments. | Rosanne Greco | 4/24/2021 | General | Technical |
| 84 | Here is a suggestion, which I think will go a very long way in showing the public all the work you have done on adding 974 additional acres of protected land: use a few paper maps of SB without any colors. On one map, draw an outline on all of the previously protected lands. On the second map, draw an outline around all of the newly protected lands. And on a third map, draw a line around all of the lands which once were protected but are no longer protected (if this is the case). We can then see—without any of the colored clutter—where the new 974 areas are located. Would it be possible to show these on Tuesday? | Rosanne Greco | 4/24/2021 | General | Technical |
| 85 | . I intend to keep pushing for the answers on whether the new LDRs end up accomplishing what we, the people, requested of our city almost three years ago: stop allowing housing to be built on the rural lands in the SEQ. | Rosanne Greco | 4/24/2021 | General | Policy |
| 86 | A lot of folks – including me – are very confused as to the location of the newly protected 974 acres in the City. I tried all the various mapping tools and just have not been able to get a "clean" version of the new acreage because the new habitat block layer over-writes the current layers in all of the tools that I could find. Without being able to understand with clarity where these acres are I am finding it very difficult to meaningfully comment on the draft regulations. | Andrew Chalnick | 4/25/2021 | General | Technical |

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| 87 | FYI, I created the attached maps based off of the mapping layers at the following link: https://ccrccr.maps.arcgis.com/home/webmap/viewer.html?webmap=0f2e3ae2b7ab41b9a7339a72e9d87add On the first map ("current"), I selected all of the layers which show, I believe, the current zoning, including: The Major Stream (Muddy/Potash) Current 100' Buffer, Major Stream (Winooski) current 100' Buffer, Minor Stream Current 50' Buffer, Park and Recreation Zoning, River Corridor (2019), SEQ Natural Resource Protection, Park Zoning, Conserved Land by Type of Conservation. On the second map ("new") I selected, in addition: Habitat Block Revisions 2020-10-20, Staff Draft Habitat Connectors 2020 Using photoshop, I created a third map ("change") in which I highlighted the areas shown as conserved on the new map that were not shown as conserved on the old map. I then removed some small amounts of the newly conserved areas to the extent the maps showed wetlands on those areas (since the wetlands would already have been conserved under the current regulations). | Andrew Chalnick | 4/25/2021 | General | Technical |
| 88 | Finally, offering a completely different perspective, in a recent interview the Dali Lama stated "we must develop a sense of universal responsibility-for the earth and all humanity." Our world is deeply interdependent, and he further explains "we have to appreciate that local problems have global ramifications from the moment they begin." We now have the opportunity to set an example as leaders on the local level. | Alyson Chalnick | 4/26/2021 | General | Policy |
| 89 | From President Biden's new initiatives to the upcoming G7 Summit to the U.N. Earth Economics Report to the Dali Lama, one thing is clear, the world is beginning to focus on our ecology crisis at all levels. What will be South Burlington's role in confronting this threat? Every decision made in these LDRs will have a significant impact on future generations long after we are gone. | Alyson Chalnick | 4/26/2021 | General | Policy |
| 90 | To show the "newly" conserved land clearly, I think the viewer would need to be enhanced to be able to show the "conserved/park/etc", the NRP, all the mapped wetlands (with existing buffers), rivers, streams and other currently protected areas on top of the areas protected by the draft. | Andrew Chalnick | 4/26/2021 | General | Technical |
| 91 | Thank you very much, Jessica. I hope the staff is able to produce simple....non-interactive maps...for folks with poor eyesights and/or with poor computer skills in the coming week or so. I have a problem seeing details on a computer screen; and I know others in my age bracket have similar problems. Frankly, there is too much "clutter" on the interactive maps...and pardon the pun... but the forest is getting lost in the trees. Given that I think there is overlap between the existing protection areas and the newly protected areas, I think it would be much easier to compare the changes with two (or three) maps as I suggested: one with existing protections, one with only the newly added protections, and one (if true) with any deleted protection areas. | Rosanne Greco | 4/26/2021 | General | Technical |
| 92 | Our few remaining open spaces provide extensive public health, social and economic benefits. "Science shows us that leveraging the power of nature is one of the most effective tools we have to address the climate emergency. Healthy forests, grasslands and wetlands can deliver up to a third of the global emissions reductions needed by 2030." (Nature Conservancy) As climate change scientists are imploring, now is the time to act. Yet, we are targeting much of this existing open space for development. | Janet Bellavance | 4/27/2021 | General | Policy |
| 93 | Let's rethink the "location" of development in our city. Why are we building on our remaining open spaces? Why aren't we incentivizing redevelopment of existing structures for housing? These underutilized properties already have infrastructure (water, sewer, roads, utilities). The city should make it easier to redevelop already existing land than to develop on green space. This could be done by making it harder and more expensive to develop green space, by removing barriers/costs to redevelopment, or a combination of the two. In neighboring towns we see many creative examples of redevelopment of commercial space for housing. | Janet Bellavance | 4/27/2021 | General | Policy |
| 94 | One of the protected "primary conservation areas" depicted on Map 7 is "Riparian Connectivity." It is no accident that the City designated these riparian connectivity areas as off limits to development. "Surface Waters and Riparian Areas" include not only rivers, streams, lake, ponds and wetlands but also the floodplain and land surrounding these water bodies that are impacted by the waterways. See "ANR Fish & Wildlife Department, Mapping Vermont's Natural Heritage: A Mapping and Conservation Guide for Municipal and Regional Planners in Vermont," 2018, at p. 48, available at: https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Get%20Involved/Partner%20in%20Conservation/MVNH-web.pdf (last visited Apr. 27, 2021) (hereafter, "ANR Guide") ("Surface Waters and Riparian Areas maps the entire area impacted by these waterways, including not only the water itself but also the surrounding land. This surrounding area is referred to as the riparian area."). | Daniel Seff | 4/27/2021 | General | Policy |
| 95 | The conservation areas depicted on Maps 7 and 8 need protection now more than ever. And yet, the latest draft of the Planning Commission's proposed SBLDR revisions weakens the protections afforded by existing SBLDR Section 9.06(B)(3). In fact, that Planning Commission draft omits completely the reference to protection for the "conservation areas shown in the Comprehensive Plan. . . ." SBLDR § 9.06(B)(3) (emphasis added). To date, I have not heard any reason – much less a good reason – for removing the incorporation of Maps 7 and 8 into SBLDR Section 9.06(B)(3). | Daniel Seff | 4/27/2021 | General | Policy |

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| 96 | Moreover, SBLDR Section 9.06(B)(3) is consistent with State statutory law, which provides that municipalities can "identify, protect, and preserve important natural and historic features of the Vermont landscape," including "significant natural and fragile areas" and "outstanding water resources, including lakes, rivers, aquifers, shorelands, and wetlands." 24 V.S.A. § 4302(c)(5)(A), (B). | Daniel Seff | 4/27/2021 | General | Policy |
| 97 | In conclusion, I strongly encourage the Planning Commission to maintain SBLDR Section 9.06(b)(3)'s incorporation of Maps 7 and 8. And if the Planning Commission fails to do so, I would urge the City Council to reject the proposed SBLDR revisions. | Daniel Seff | 4/27/2021 | General | Policy |
| 98 | I find the interactive map...unclear (as well as difficult to use). It would be helpful to clarify not only what is existing but what is proposed to stay existing. I understand blue is proposed and yellow is existing. I hope my question is clear. | Loretta Marriott | 4/30/2021 | General | Technical |
| 99 | Several other important items for consideration are: protections of agricultural soils, protection of grasslands and shrub lands, and inclusion of the "supporting habitats" surrounding the habitat blocks, as articulated by Arrowwood Environmental . | Sarah Dopp/SBLT | 5/2/2021 | General | Policy |
| 100 | Even though some of us have been reading LDRs for years, the language used in these draft Articles is confusing, and in some places, seemingly contradictory. We even heard a Planning Commissioner admit he didn't understand the meaning of some of the provisions. If people who deal with LDRs are confused, one can assume that many of the general public will not understand these articles or their implications. This could result in fewer comments. Or, it may take a considerable amount of time during the public comment period to explain the meaning of the Articles. Since these LDRs will have significant impacts on South Burlington's future land use, it is essential they are understandable and have no unintended consequences. | SBLT | 5/2/2021 | General | Technical |
| 101 | Include an Executive Summary written in lay terms for each Article which states the goals for the Article and how the Article achieves those goals. | SBLT | 5/2/2021 | General | Technical |
| 102 | Re-draft the Articles using non-technical and straightforward language; or add a supplemental layperson version—similar to what is now required with other explanatory documents dealing with legal and medical matters. | SBLT | 5/2/2021 | General | Technical |
| 103 | Include a graphic or photo of selected parcels of land which depicts what the proposed language would allow. For example, give one or two examples of properties which could be developed using these new regulations, and how these properties would look if maximally developed under Article 12 and 15. | SBLT | 5/2/2021 | General | Technical |
| 104 | Spell out all acronyms before first using them, and include a glossary with these commonly used acronyms and terms. | SBLT | 5/2/2021 | General | Technical |
| 105 | The answers to these general questions are fundamental for the public to know in order to understand the issues and the implications of the proposed Articles. 1. Do the articles result in more land being conserved? Where is this land? 2. Do the articles list stronger environmental protections? What are these measures? 3. Do the articles continue to protect the land areas identified in the Comprehensive Plan as "Primary and Secondary Conservation Areas" (Maps 7 and 8)? How do the new regulations do this? 4. Do Articles 12 and 15, as well as Articles 10 and 18, complement each other? Have any contradictions among them been resolved? Are they completely in synch and supportive? 5. Would new PUD regs effectively "up-zone" the SEQ from a base of 1.2 to as much as 16 units per acre, vs. the 4 or 8 per acre now allowed in certain circumstances? 6. In a Conservation PUD, where 70% of the acreage would be conserved, is that 70% of 6. In a Conservation PUD, where 70% of the acreage would be conserved, is that 70% of buildable land (excluding hazards and level I and II resources) OR the total land in the parcel? 7. What is the difference between density based on Building Type and density based on District or Zone Density? | SBLT | 5/2/2021 | General | Policy |
| 106 | While Article 12 goes into detail on water issues, this chapter should be broadened to become a comprehensive document addressing all areas of our natural environmental. It rightly devotes considerable treatment to wetlands, forest blocks, and habitat areas. But there are other natural resources needing environmental protection, such as riparian areas, fields and meadows, soils, etc. Past studies commissioned by the city address these areas and are a source to be drawn from to make this chapter complete. | SBLT | 8/18/2020 | General | Policy |
| 107 | The rationale and purpose for drafting Article 12 as stated in the Article and in the cover memo from Paul Conner, provide valuable insights into the need for environmental protections. However, in many areas of the current draft there is a lack of specificity needed in a regulatory document. As currently written, decisions on environmental protections are frequently left to the subjective opinions of the members of the Development Review Board (DRB). We have heard many times from DRB members that they are there to make sure that development applications comply with city regulations. They are not supposed to create or interpret regulations. They have stated that without clear and specific regulations, they are left to deduce what the planners intended, or to come up with their own interpretation. General or ambiguous terminology in LDRs has led to confusion and uncertainty among DRB members and has even resulted in legal challenges—the JAM Golf lawsuit being one prime example among others. | SBLT | 8/18/2020 | General | Policy |

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| 108 | In the cover memo, Paul Conner states that the Environmental Protection Standards draft is “intended to be clear and user-friendly”. This is refreshing to read. However, some of the foundational terminology used is confusing and ambiguous. In particular, using the word “hazard” for high-value natural resource areas is problematic. The common dictionary definition of that word is “potential source of danger”. It is likely that the average citizen would think that hazard areas are dangerous areas. Other nomenclature, such as “level 1 and level 2” are ambiguous. Without a clear definition and specific regulations associated with these numbers, they are merely numerals. Using “clear and user-friendly” words, such as “high or medium or low priority” along with the statutes associated with each will make these levels understandable. | SBLT | 8/18/2020 | General | Policy |
| 109 | The recent Arrowwood study is cited as a source for some of the draft. As valuable as the study was, it focused on only one area of the environment. Regarding our first comment on having this article provide protections for the total natural environmental, more environmental areas need to be addressed using more environmental studies and reports. There are dozens of past environmental studies commissioned by the city, including the recent studies done under Interim Zoning. To ignore them would be foolhardy and a waste of taxpayer money. | SBLT | 8/18/2020 | General | Policy |
| 110 | Past environmental standards based on older science, or before climate change impacts were understood, need to be updated. The amount of buffer areas is an example. Even in Vermont, extreme weather events are becoming more frequent, Lake Champlain is in peril, as are all of South Burlington’s waterways. Further, arable land is being lost, wetlands and riparian areas have been damaged, wildlife is disappearing, and more. More stringent protection measures based on improved and enlightened assessments need to be incorporated into this Article. | SBLT | 8/18/2020 | General | Policy |
| 111 | It is unclear what role the city’s Natural Resource Committee plays in this Article. As the only city entity devoted to natural resources, we think it appropriate that this committee have input on all developments which threaten to impact the natural environment. | SBLT | 8/18/2020 | General | Policy |
| 112 | The SBLT firmly believes that South Burlington needs to put in place clear and powerful standards to protect our natural environment. The city’s Comprehensive Plan, as has every environmental study commissioned by the city in the past, advocates for land preservation. It is past time to codify these requirements into the city LDRs. Article 12 is the ideal way to do that. The SBLT will use our knowledge and experience to partner with the Planning Commission in drafting the necessary language to accomplish this. We look forward to hearing how we can best support making Article 12 a successful environmental protection document. Thank you for giving us this opportunity. | SBLT | 8/18/2020 | General | Policy |
| 113 | Larkin with the lakefront property that is bisected by river corridor should have a conversation with the planning director or commission. Similarly, a former PC member John Belter who stands to have his whole farm designated as a hazard should be communicated with on a personal level. The last IZ neglected him and his expertise entirely for farming and for the use of the Underwood Property. This is not the Vermont way. The AuClairs and LeDucs have been consulted and included to a certain extent but may also feel dictated to. You’ve seen concerns from large parcel owners on Spear and Dorset who discuss their plans and the legacy they want for their families from their property holdings and how the City disrupts this with these updates. The personal touch is still important and even more so with this kind of update and where it leads. More conserved property is acquired and happens because of relationships and common communication than in dictating terms. We have a few large landowners and generational families left in SB and we should be categorizing and cultivating our planning discussions with them first and foremost. It would be good to identify these folks and the commercial developers to develop good communication pathways with them as a concurrent way forward in these goals. This has often been missing from good planning practice. Their numbers are few. We have the time. It costs little and can achieve so much – and it is more in line with our ability to personally connect here. | Chris Shaw | 5/3/2021 | General | Policy |
| 114 | Outreach – actively seek out comment, input and feedback from large parcel owners. | Chris Shaw | 5/3/2021 | General | Policy |
| 115 | Some of the terms are not defined in the draft documents. Are you using the definition of “Forest Block” from Act 171, and “Habitat Block”, and “Habitat Connector” from the Arrowwood Report? Is “Forest Block Connector” defined elsewhere? | UVM | 0511/21 | General | Technical |
| 116 | 3.04(H): Definition of “Undue Adverse Effect”: The definition is not entirely clear, and seems subjective. It is almost impossible to imagine an encroachment into a Habitat Block that would not create an “unfavorable impact” upon the natural resource in question. What site or design modifications, mitigation or conditions of approval would serve to “avoid” an unfavorable impact? | UVM | 5/11/2021 | General | Technical |
| 117 | The standard for determining whether an adverse impact is “undue” is, in application, unclear and seems subjective. | UVM | 5/11/2021 | General | Technical |
| 118 | Article 15 – Subdivision and Planned Unit Development Review 12. General: As discussed above, there are no proposed amendments to the PUD provisions that would provide any relief for the adverse consequences of the Environmental Protection Standards on UVM parcels wholly or substantially covered with Habitat Blocks. This form of relief is essential and UVM will want to have the opportunity to participate in any further consideration of the PUD standards. | UVM | 5/11/2021 | General | Policy |
| 119 | §15.02(A)(4)(d): If the City intends to allow applicants to use the PUD process for relief from the Environmental Protection Standards, including the Habitat Block restrictions, this subsection could be interpreted as prohibiting any modification to the Habitat Block restrictions since Habitat Blocks are defined as a Level I Resource. | UVM | 5/11/2021 | General | Policy |

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| 120 | The current online-only format for Planning Commission meetings has made it extremely challenging for this experienced legal professional to understand the Planning Commission's proposed changes to SBLDR concerning the protection of natural resources, both in terms of the changes being suggested and the reasoning behind the proposed changes. By way of example, during a recent online-only Planning Commission meeting, Director of Planning and Zoning Paul Conner gave a presentation. Mr. Conner displayed numerous maps in an effort to show the Planning Commission and the small handful of us watching online which natural resource areas are protected by the SBLDR currently as compared to the natural resource areas which would be protected under the proposed SBLDR amendments under consideration. With the utmost respect to my friend Mr. Conner, the presentation was extremely difficult to follow on a computer screen. The complex color-overlaid maps were way too small to begin with, and the rapid switching from map to map made it impossible for online viewers to refer back to maps that had been displayed earlier. (I can only imagine the difficulties experienced by those who were watching on a smartphone or tablet.) | Daniel Seff | 4/5/2021 | General | Technical |
| 121 | Commenter provided comments including text from other sources. See letter of 4/27 | Daniel Seff | 4/27/2021 | General | Policy |
| 122 | UVM provided history/usage/planned projects for parcels they own in SB. See letter of 5/11 | UVM | 5/11/2021 | General | Policy |
| 123 | The University has several large parcels, almost all covered with habitat blocks. They want to be a good steward of the land but also a good steward of UVM which raises the question of UVM's expectations to use those parcels over many years. Ms. Ravin stressed that UVM is anxious to work with the city regarding protection and usable value of UVM land. | Lani Ravin/UVM | 4/27/2021 | General | Policy |
| 124 | Mr. Thrall, who lives near Mr. Jimenez, asked for a definition of "substantial improvement." Mr. Thrall asked what a "fully enclosed area below grade" is. He said they have an unfinished basement they were hoping to finish. | C. Thrall | 4/27/2021 | General | Technical |
| 125 | Mr. O'Brien said that in some hazard areas, field delineation can be introduced, but in some (e.g., habitat blocks) it can't. He felt that it should be allowed or that a field specific delineation occur and a new map be generated every 5 years. He noted that in 3 large projects he is work on, when you go to the maps, 100% of the time the map of reference won't match the field delineation. | Patrick O'Brien | 5/4/2021 | General | Policy |
| 126 | Mr. Nick, owner of the Hill Farm, noted he had been assured this wasn't "a back door taking," but his feeling is that it is. He noted little blue dots on the maps which he thought were wetlands, and he knows there are no wetlands there. He said he would like not to see a map go out with incorrect mappings that will set the city up for endless appeals. Ms. Louisos said those blue dots may be steep slope areas. On the interactive map, these can be identified. She also acknowledged that in some cases the maps are inaccurate. Mr. Nick said there should be language to that effect. | Jeff Nick | 5/4/2021 | General | Technical |
| 127 | Mr. Nick said he looked at the interactive map. The light blue dots appear to be "drainage areas." He said that on his land, they are around where a house has been removed, and there are no wetlands there. He asked how that map can be corrected. | Jeff Nick | 5/4/2021 | General | Technical |
| 128 | I attempted, via a post in the online "chat box," to encourage the Planning Commission to hold off on any public hearings concerning proposed natural resources-related amendments to the SBLDR until such time as we are able to meet in Letter to Helen Riehle, Chair & Jessica Louisos, Chair person once again. Given the seemingly miniscule level of public attendance during the online only Planning Commission SBLDR amendment proceedings to date, given the even lower level of public participation in those proceedings (the "chat box" is an ineffective public participation tool, as I have witnessed repeatedly), and given the critical importance of the subject matter under discussion, which will have profound effects for many years to come, it is, I believe, a moral and ethical imperative than any public hearings take place in-person. It would be a travesty if SBLDR amendments concerning critical natural resource protection issues were rushed though during this time of widespread 'Zoom fatigue.' | Daniel Seff | 4/5/2021 | General | |
| 129 | South Burlington residents petitioned for IZ out of a concern that the LDRs do not sufficiently protect South Burlington's precious natural resources, particularly in the SEQ. While the current draft of the proposed amendments to the LDRs provides some incremental protection for natural resources in the City, it also removes some protections. The level of protection for natural resources in the City needs to be dramatically strengthened to meet the ecological challenges that we face and fails to meet the expectations of the citizens that petitioned for IZ. How much of South Burlington's remaining natural resources should be protected, and how much should be developed? What is the right balance? It's pretty clear we have already consumed most of South Burlington's natural resources, and "balance" was likely achieved some time ago. With the 9500 existing homes, commercial and municipal infrastructure, around 75 percent of the agricultural soils that at one time existed in South Burlington have already been paved over with highways, airport runways, parking lots, buildings, lawns, sports fields, solar farms, or fragmented into tiny parcels. On top of this, there are at least (even with IZ, and according to City staff) an additional 1150 new additional homes in the pipeline to be built on mostly rural lands. Over-development has left every watershed in South Burlington impaired. | Andrew Chalnick | 5/16/2021 | General | Policy |

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| 130 | Our few remaining open spaces provide extensive public health, social and economic benefits that include energy conservation and climate cooling, habitat for pollinators, water filtration, absorption of air pollutants, improved wildlife habitat, recreational enjoyment, aesthetic relief and noise reduction. The Earth Economics report commissioned by the City estimates the value of the ecosystems in the priority open spaces — those identified by the Interim Zoning Open Space Committee — would be between \$73 and \$240 million over the next twenty years. Our open spaces provide life and nourish our souls. | Andrew Chalnick | 5/16/2021 | General | Policy |
| 131 | More broadly, the world is facing a series of grave ecological crises: 41 percent of insect species have seen steep declines in the past decade in the US, North American butterflies have declined by 53 percent, grasshoppers and crickets by 50 percent and bee species by 40 percent. Between 1970 and 2014 the planet has lost nearly 60% of its mammals, birds, fish, reptiles and amphibians. The rate at which Earth is losing its biodiversity is comparable only to the mass extinctions. Human sprawl is top of the list for these declines. The climate crisis accelerates and deepens our ecological crises, but preservation of open space can combat climate change. The 2014 Chittenden County Regional Planning Commission Climate Action Guide set as a priority strategy for Chittenden County the maintenance of “vegetative landscapes to support carbon sequestration” stating that “[m]aintaining vegetated landscapes – forests, wetlands, agricultural lands and urban trees and vegetation – is important for continued carbon sequestration. Vegetated landscapes also help with climate adaptation by absorbing precipitation, reducing stormwater runoff, maintaining natural habitats, and reducing the urban heat island effect.” It is sometimes hard to feel these crises in Vermont as we are so blessed with natural resources, and things seem business as usual. But, they are not. | Andrew Chalnick | 5/16/2021 | General | Policy |
| 132 | Natural resource protection should be at the heart of any city’s growth plan. As stated we are falling short as noted by Kate McCarthy of the Vermont Natural Resources Council, “Despite the many housing, transportation, and affordability benefits that have come from our smart growth approach over the last thirty years, it is not enough. We are falling short in Vermont, and in the process, we’re losing things we care about. We are seeing the hollowing out of our downtowns and rural villages, the heart and soul of our small towns – places where we can connect with one another and support local businesses. We’ve also seen the steady chopping up and development of our working lands, the farm and forestland that give us both an important economic engine and a renowned landscape.” The Vermont Natural Resources Council is working to strengthen Act 250 to help aide smart development of communities across Vermont. As a city we also need to look at our development regulations and ask are they strong enough to protect the natural resources of our beautiful city. The Interim Zoning regulations were put in place because the citizens felt out LDRs were not strong enough to protect our natural resources. | Nick Mancuso | 5/19/2021 | General | Policy |
| 133 | we are concerned about development of the Hill Farm property that abuts Wheeler Park. The Hill Farm property is a wonderful parcel with breathtaking views of the Adirondacks. | Nick Mancuso | 5/19/2021 | General | Policy |
| 134 | Why was a land area connected to The Great Swamp — THE highest valued natural land in South Burlington — eliminated from protection? | Rosanne Greco | 4/1/2021 | Floodplains | Policy |
| 135 | Floodplains – Why throw another layer of regulation on top of homeowners? If an existing structure is within the floodplain and seeks a permit for expansion, then it goes to the state review. This does not happen now. Labelling neighborhoods and industrial areas such as Dorset Farms, Dorset Village, Butler Farms, Ethan Allen Drive, White St/Pine Tree Terrace, Brookwood Drive, and CCRCF unnecessarily clamps down on in-fill and redevelopment. It will aggravate existing owners – introducing burdens, both perceived and real. Opens the City to more potential litigation. This update unnecessarily labels neighborhoods – based on modeling in 2011 by FEMA but not LIDAR. Hard to understand whether actual claims data is being extrapolated and included to achieve the percent probability that forms the “500 year” mark. The whole City was underwater at one time (20x longer than the “500yr mark”), so it’s hard to see the value of reaching back for a 500-yr benchmark when our crisis has shortened the 100-year floods to 50. | Chris Shaw | 5/3/2021 | Floodplains | Policy |
| 136 | Mr. Jiminez, a resident of Butler Farms, said he is alarmed by the floodplain overlay district as it seems like it’s going right up to his property. He asked why a floodplain would change so that they are limited as to what they can do with their property. Are they prohibited from putting up a shed or greenhouse? | J. Jiminez | 4/27/2021 | Floodplains | Policy |
| 137 | Do the articles continue to protect the land areas identified in the Comprehensive Plan as “Primary and Secondary Conservation Areas” (Maps 7 and 8)? How do the new regulations do this? | SBLT | 2/17/2021 | Comprehensive Plan | Policy |
| 138 | The Comprehensive Plan designates Grassland, Shrublands and Farmlands as “secondary conservation areas ... in which limited encroachment may be allowed in accordance with siting and management practices that are intended to avoid, minimize or mitigate the adverse impacts of development.” But, it is not apparent where these areas have any protection in Article 12. The Secondary Conservation Areas map in the Comp Plan (attached) shows the respective grasslands, shrublands and farmlands. In Arrowwood’s presentation to the City Council they said “supporting habitat (undeveloped, unmanaged non-forest) plays a big part in the success of habitat blocks” (page 22 of the Arrowwood presentation, attached) and in their report to the City stressed the importance of supporting habitat (report is also attached). It does not appear that these supporting habitat areas have any protection in Article 12. | Ray Gonda, NRCC | 3/3/2021 | Comprehensive Plan | Policy |

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| 139 | The Comp Plan also has as goals (page 2-123): *Continue the designation of a three hundred foot buffer around the perimeter of the Great Swamp and Cheese Factory Swamp as an additional primary natural area subject to the same limits on disturbance, development or subdivision. *Continue the designation of lands within a three hundred foot buffer area around the perimeter of the other Primary Natural Areas, and the lands within Secondary Natural Areas, as a supplemental restricted area with limitations on development, subdivision, and disturbance | Ray Gonda, NRCC | 3/3/2021 | Comprehensive Plan | Policy |
| 140 | Are all of the areas currently listed as "conservation areas" (Maps 7 and 8) in the Comprehensive Plan still protected? | Rosanne Greco | 4/1/2021 | Comprehensive Plan | Policy |
| 141 | The 2016 Comprehensive Plan anticipated and prepared for a growth rate of 1.5- 2% in average annual dwelling units. Our current rate of growth is unsustainable and has serious consequences for the citizens of South Burlington and the quality of life we hope to maintain. A Cost of Community Services in VT study shows that increased residential development actually increases per capita tax rates as municipal taxes are inadequate to cover services. We will need new schools, roads, increased municipal services, etc. The Earth Economics Report commissioned by the City confirmed the vast economic benefits of preserving our remaining open space. | Janet Bellavance | 4/27/2021 | Comprehensive Plan | Policy |
| 142 | Section 9.06(B)(3)'s incorporation by reference of the Comprehensive Plan is consistent with Vermont Supreme Court case law holding that a municipal zoning bylaw can incorporate aspects of a town plan by reference. See In re Appeal of JAM Golf, LLC, 2008 VT 110, ¶ 16, 185 Vt. 201, 969 A.2d 47 ("Here, the City has chosen to incorporate the city plan into its bylaws. See § 26.151(1) (a PRD 'will [c]onform with the City's Comprehensive Plan'). Due to the broad authority granted to towns to implement their city plans, we cannot conclude that § 26.151 is an unauthorized method of zoning regulation."). | Daniel Seff | 4/27/2021 | Comprehensive Plan | Policy |
| 143 | The Comprehensive Plan details the protected conservation areas on Maps 7 and 8. These Maps are designed to avoid vagueness issues such as the one that came up in the JAM Golf case. See South Burlington Open Space Committee, Open Spaces, Special Places: Our Legacy, Our Future 13 (Apr. 2014) (in light of JAM Golf, "[i]t is now recommended that regulations clearly identify those resources to be protected – e.g., through maps. . .") (emphasis in the original), available at: http://www.southburlingtonvt.gov/2014%20Open%20Space%20Report.pdf (last visited Apr. 27, 2021). | Daniel Seff | 4/27/2021 | Comprehensive Plan | Policy |
| 144 | Since the Comprehensive Plan adopted in 2016 is the plan under which we operate until the next cycle (2024), the LDR's adopted now must regulate and relate to the vision for the City as articulated there, we also feel that there is a need to reference and explain some changes in terminology which now differ between the Comp Plan and the proposed LDR's, namely "Level I, Level II and Hazards" and how they relate to the still current Maps 7 and 8, which speak instead of "Primary and Secondary Conservation." It should be clear to any reader of the new LDR's how these differ and how they remain similar. One additional comment is to note that these are LDR's for the whole City, not just the SEQ. There are remaining open lands all over the City, though it is true that the majority of open space is in the SEQ. | Sarah Dopp/SBLT | 5/2/2021 | Comprehensive Plan | Policy |
| 145 | South Burlington once had a "Path to Sustainability" effort which included protecting our agricultural soils so that we would be able to provide food for our residents. There are numerous references in multiple city-commissioned studies on the importance of preserving the agriculture soils in South Burlington. Key among them is the 2013 South Burlington Sustainable Agriculture/Food Security Action Plan. It reported that "It would be possible to grow enough fruit and vegetables on several hundred acres to provide all city residents with a good portion of the fruit and veggies we should be eating each day. Growing that amount of food could generate more than \$9 million in farm revenue each year." We currently have around 1,400 acres of ag land. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 146 | Common Roots has since demonstrated we can grow large quantities of healthy produce on small plots of land. Food insecurity (hunger) is a problem in our city. One out of four people in South Burlington struggle to put food on their tables. Half of households experiencing food insecurity ate less fruits and vegetables since the start of the covid pandemic. Scientists report that "Sustainable, local, organic food grown on small farms has a tremendous amount to offer. Unlike chemical-intensive industrial-scale agriculture, it regenerates rural communities; it doesn't pollute rivers and groundwater, it preserves soil and it can restore the climate." | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |

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| 147 | Moreover, soil has benefits beyond providing healthy food. From a global perspective, dirt pulls carbon dioxide out of the air. It fosters 99 percent of the world's food and close to half of our oxygen. Good dirt nurtures vegetables because it is full of minerals and beneficial bacteria. Healthy soil boosts crops, filters water, and stores water during droughts and floods. Soil specialists tell us that soil can help us through the tough times, mitigate nutrient losses, slow down climate change, and soil-friendly practices could improve water quality in the Lake Champlain Basin. This is more important than ever because experts now recognize that the way our food is currently produced is having negative effects on the environment (pollution and soil erosion), human health (obesity) and rural economies (farm consolidation and mechanization). Whereas, a food system that is founded on principles of sustainability and food security has vast potential to improve public health, the environment, and society. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 148 | With 9,500 existing homes, most of the agricultural soils that at one time existed in South Burlington have already been developed with highways, airport runways, parking lots, buildings, lawns, sports fields, solar farms, or fragmented into tiny parcels. On top of this, there are at least an additional 1150 new homes in the pipeline to be built on mostly rural lands. This is a 12% increase in our housing stock while we are still in interim zoning. | Janet Bellavance | 4/27/2021 | Agricultural Soils | Policy |
| 149 | Sustainable Agriculture integrates three main goals: environmental health, economic profitability, and social equity (sometimes referred to as planet, profit and people). But it all starts with saving the soil. One of the surprises from the analysis was how a relatively small amount of fertile soil can produce large amounts of healthy fruits and vegetables. They reported: "There are 2,200 acres of undeveloped agricultural soils in the city, 1,400 of which are suitable for cultivating crops. It would be possible to grow enough fruit and vegetables on several hundred acres to provide all city residents with a good portion of the fruit and veggies we should be eating each day. Growing that amount of food could generate more than \$9 million in farm revenue each year." | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 150 | Even before city residents were aware of the threats to our food systems and the impacts it was having on their neighbors, they supported saving our farmlands. Multiple surveys conducted of South Burlingtonians showed their support for protecting agricultural lands. Here are some statistics from a few surveys conducted in recent years: 82% supported protecting agricultural lands; 66% supported keeping farmland available for farming in the Southeast Quadrant; 73% agreed that more of the Open Space Fund should be dedicated to farmland protection; 67% favored conserving farmland. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 151 | South Burlington used to have a lot of high quality fertile soil. Unfortunately, we paved over most of it. But, what we have left has the potential to provide healthy food for most of our residents. This will become increasingly important as irresponsible ways of industrial farming is depleting not only the amount of fertile agricultural land, but it is also degrading the nutritional quality of the soils. The effects of human-caused climate change is threatening our food sources even further. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 152 | There are far-reaching benefits of preserving agricultural soil. A recent article in Independent Science News, stated, "Sustainable, local, organic food grown on small farms has a tremendous amount to offer. Unlike chemical-intensive industrial-scale agriculture, it regenerates rural communities; it doesn't pollute rivers and groundwater...it preserves soil and it can restore the climate." | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 153 | Moreover, soil has benefits beyond providing healthy food. There is power in dirt. From a global perspective, dirt pulls carbon dioxide out of the air. It fosters 99 percent of the world's food and close to half of our oxygen. Without dirt, none of us would be here. Good dirt nurtures vegetables because it is full of minerals and beneficial bacteria. Healthy soil boosts crops, filters water, and stores water during droughts and floods. Soil quality is a really important entity as the climate changes. Heather Darby, an agronomic and soil specialist at UVM Extension said, "The function of soil can help us through the tough times, mitigate nutrient losses, feed the world, and slow down climate change... and soil-friendly practices could improve water quality in the Lake Champlain Basin." She and other experts are urging decision-makers to educate themselves about soil. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 154 | There are numerous references in multiple city-commissioned studies on the importance of preserving the agriculture soils in South Burlington. Key among them is the 2013 South Burlington Sustainable Agriculture/Food Security Action Plan. The consultants examined South Burlington's geomorphic setting, climate, soils and hydrology and identified the soils suitable for agriculture in South Burlington. The analysis showed that most of the city's best quality agricultural soils have been developed. Of the 10,600 acres of land in South Burlington, 78% were covered with soils that are classified as prime or statewide (the best types of soils). But the majority of these are now under highways, airport runways, parking lots, buildings, lawns, sports fields, solar farms, or fragmented. However, they found that what we still have is enough. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |

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| 155 | The report stated that there was a growing recognition that the way our food is currently produced is having negative effects on the environment (pollution and soil erosion), human health (obesity) and rural economies (farm consolidation and mechanization). A food system that is founded on principles of sustainability and food security has vast potential to improve public health, the environment, and society. Sustainable Agriculture is a way to foster a diet of affordable, healthy, locally-grown food for city residents. But...first you have to save the soil. | Rosanne Greco | 4/26/2021 | Agricultural Soils | Policy |
| 156 | Ms. Greco said that agricultural land should also be protected. | Rosanne Greco | 4/27/2021 | Agricultural Soils | Policy |
| 157 | Prime and Other Agricultural Soils. South Burlington commissioned the “Sustainable Agriculture/Food Security Action Plan” in 2013. That report describes that of the 10,600 acres of land in South Burlington, 8,238 acres are agricultural soils, with 873 of those acres considered “Prime”. According to the report, prime soils have: “. . . the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, and oilseed crops and are also available for these uses. Prime Farmland has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed according to acceptable farming methods.” There are far-reaching benefits of preserving agricultural soil. A recent article in Independent Science News, stated, “Sustainable, local, organic food grown on small farms has a tremendous amount to offer. Unlike chemical-intensive industrial-scale agriculture, it regenerates rural communities; it doesn’t pollute rivers and groundwater...it preserves soil and it can restore the climate.” The City recognized the importance of preserving agricultural land in the interim bylaws which specifically direct the review of “working landscapes such as the City’s remaining large farms”. | Andrew Chalnick | 5/16/2021 | Agricultural Soils | Policy |
| 158 | For agricultural soils, developments should be required to maintain all or some portion of the agricultural soils intact, perhaps through the use of mandated Conservation PUDs. | Andrew Chalnick | 5/16/2021 | Agricultural Soils | Policy |