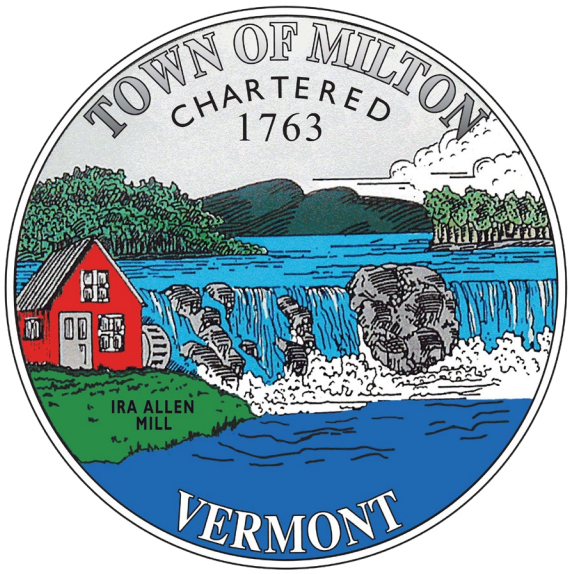
Exhibit Petitioner JRF-6

Town of Milton Vermont



2018 Comprehensive Plan

Prepared by the Milton Planning Commission
and the Milton Selectboard
Adopted February 5, 2018
Amended July 15, 2019
Amended January 3, 2023

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CVPS operates three hydroelectric dams along the Lamoille River in Milton: Peterson Station, Milton Station, and Clark Falls. These three dams are part of the 21-megawatt Lamoille Hydroelectric Project consisting of four dams along the Lamoille River (the fourth dam being Fairfax Falls located in the Town of Fairfax). In 2005, the Federal Energy Regulatory Commission issued a 30-year license for continued operation of the hydroelectric project, ensuring that this renewable energy resource will remain in operation through at least 2035.

Goal 5.3.1. The Town shall continue to support renewable energy projects of an appropriate scale for the community, and when feasible, assist with grant opportunities or provide other Town resources in support of such projects.

Goal 5.3.2. Due to ongoing changes in technology, the Town will continue to review and revise the Unified Development Regulations as necessary to encourage the use of renewable energy resources while carefully weighing the benefits of such projects against their potential impacts on other resources, including cultural, historical, environmental/natural, and aesthetic resources.

5.4. Future Utilities Siting

Towns may regulate telecommunications facilities, although local control is limited by federal law and as with renewable energy projects, major utility projects of any type fall under the jurisdiction of the State of Vermont Public Service Board. Appendix B of the Milton Zoning Regulations was adopted to regulate wireless telecommunications facilities. One of the purposes of Appendix B is to minimize the total number of wireless telecommunications towers in Town by encouraging the co-location of these facilities and the use of existing towers and structures. Other purposes of the bylaw are to create a clear review process for wireless communications facilities, to ensure they are designed to minimize adverse aesthetic impacts, and to facilitate the ability of telecommunications service providers to provide such services in a manner that is consistent with the community values and goals contained in the Comprehensive Plan.

Goal 5.4.1. The Town will continue to encourage the co-location of telecommunication facilities and the appropriate siting and screening of these facilities.

Goal 5.4.2. The Town of Milton should encourage the Public Service Board to require that new regional transmission lines, substations, and similar facilities are located within existing utility corridors to minimize their impact on the community and its natural, scenic, and historic resources.

Goal 5.4.3. In general, the placement of utility poles, transmission lines, substations, and other facilities should minimize disturbance to natural resources (including wetlands, streams, and wildlife habitat), scenic ridgelines and viewsheds (such as Georgia Mountain, Cobble Hill, Arrowhead Mountain, the Forestry/Conservation/Scenic Ridgeline Zoning District, and Lake Champlain

shoreline), and other natural and historical resources. In cases where it is feasible to do so, they should be placed underground.

Goal 5.4.4. The Town will encourage and support the extension of natural gas service to areas not currently served.

Goal 5.4.5. The Town of Milton Zoning Regulations state that the placement of electrical service lines to outdoor-lighting fixtures should be placed underground. The Zoning Regulations should be revised to require, where appropriate, that all new and relocated local utility lines be placed underground, including, but not limited to, electric, cable, telephone, and natural gas lines. Above-ground utility placement for new development should only be allowed in cases where environmental constraints would make it cost-prohibitive or impossible to place underground.

Goal 5.4.6. Siting and screening requirements should be adopted for regulating above-ground utility lines.

5.5. Sustainable Foods Systems

There are several reasons to support local, sustainable foods systems as a way of reducing energy cost and consumption, in addition to the health and community benefits local food systems provide. Large-scale agriculture requires enormous amounts of energy inputs in the form of on-farm fuel; transportation fuel; fertilizer, pesticide, and herbicide production and application; and storage. Organic and local food production reduces energy requirements across the board, provides a safer and more nutritious food supply, and provides economic benefits to the community. The Town should support more agricultural endeavors in Town as a means of reducing agricultural-related energy costs and to encourage the health, community, and economic benefits that local and sustainable food systems provide. However, in recognition of the inevitable conflicts that can arise between different land uses, the Town should consider amendments to the Unified Development Regulations and/or the adoption of an ordinance to better define and regulate the types of agricultural uses to be allowed in various parts of Town. Although certain agricultural operations are exempt from local review, the rise of smaller, backyard agricultural operations means that the potential for neighborhood conflicts do exist.

While it may not be necessary to regulate backyard-type agricultural uses in the more rural areas of Town, it may be appropriate to do so in the more densely-developed parts of Town. Doing so would allow more Milton residents to engage in sustainable agricultural endeavors while minimizing the potential for neighborhood conflicts. The Unified Development Regulations should be amended to better define and differentiate between various types of agricultural operations and to define parameters for these uses. Some examples of regulations that could be considered that are specific to backyard-type agricultural uses in the more densely developed parts of Town include the following:

2018 Chittenden County ECOS Plan

Adopted 6/20/2018

For a healthy, inclusive, and prosperous community

Chittenden County RPC
Communities Planning Together

GBIC
Good Jobs In A Clean Environment

This plan is the Regional Plan, Metropolitan Transportation Plan, and Comprehensive Economic Development Strategy in one.

This plan can be found online at: www.ecosproject.com/plan

17. Energy - Move Chittenden County's energy system toward a cleaner more efficient and renewable system that benefits health, economic development, and the local/global climate by working towards the State's Comprehensive Energy Plan goals.

3. IMPROVE THE SAFETY, WATER QUALITY, AND HABITAT OF OUR RIVERS, STREAMS, WETLANDS AND LAKES IN EACH WATERSHED.

While striving toward all of these ECOS strategies, and particularly Strategy #2 – 80% of growth in 15% of our land area, it is essential to do so in such a way that we do not impair our essential water resources (including potable water) and that we prepare ourselves for the impacts of a changing climate.

1. **River Hazard Protection** – Develop and implement adaptation strategies to reduce flooding and fluvial erosion hazards. While supporting planned growth, ensure that growth is evaluated in terms of preparedness for a changing climate. Chittenden County will continue its efforts, along with the municipalities, to avoid development in particularly vulnerable areas such as floodplains, river corridors, wetlands, lakeshore and steep slopes; protect people, buildings and facilities where development already exists in vulnerable areas to reduce future flooding risk; plan for and encourage new development in areas that are less vulnerable to future flood events (see Strategy 2); and implement stormwater management techniques to slow, spread and sink floodwater (see the Non-Point Source Pollution section below).
    a. Identify problem locations - Conduct on the ground inventories and map flow and sediment attenuation locations and problematic infrastructure (undersized culverts, eroding roadways, "vulnerable infrastructure" - infrastructure subject to repeat damage and replacement, etc.).
    b. Revise bridge/culvert designs - Revise public works and zoning ordinances with culvert and bridge design specifications that allow for wildlife passage and movement of floodwater and debris during high intensity events. Implement culvert and bridge designs that produce stable structure in river channels (i.e. fluvial geomorphology).
    c. Protect river corridors– Existing bylaws protect the majority of Fluvial Erosion Hazard (FEH) areas with stream setbacks and floodplain regulations. Work with ANR to get the FEH data incorporated into the River Corridor Protection Area maps. Work with municipalities and ANR to improve bylaws to protect the River Corridor Protection Areas or River Corridors not currently protected and enforce these bylaws. Continue protection of river corridors including non-regulatory protection measures such as stream re-buffering, river corridor easements on agricultural lands, river corridor restoration and culvert and bridge adaptation.
    d. Support non-regulatory conservation and/or preservation of vulnerable areas through public and land trust investments, including identification of repetitively damaged structures and provide assistance to elevate, relocate or buy out structures, and identify where flood storage capacity may be restored and conserved.
    e. Participate in the development and implementation of the Lamoille, Winooski and Direct to Lake Tactical Basin Plans. CCRPC will work with the State, municipalities and other partners to address river hazard protection, flood resiliency and water quality through these Plans – including prioritizing projects for funding.
    f. To protect water quality, development should be located to avoid state and local known constraints that have been field verified, and to minimize impacts to state and local possible constraints that have been field verified.
        i. State and Local Known Constraints, as protected by municipalities and State agencies, are shown on Map 9 and include the following: DEC River Corridors,

FEMA Floodways, and Municipal Water Quality Setbacks, Local Known Constraints – see constraint tables under the description of Map 9 in Supplement 3.

ii. State and Local Possible Constraints are shown on Map 9 and include the following: FEMA Special Flood Hazard Areas and hydric soils, Local Possible Constraints – see constraint tables under the description of Map 9 in Supplement 3.

2. **Non-point Source Pollution** - While we have addressed point sources of pollution, non-point sources are still contributing pollutants to our water bodies.
    a. Assemble data – Work from existing data collected and further identify the locations that are contributing to water quality pollution such as flow, sediment, pathogen and nutrient. Where needed, conduct on-the-ground inventories of water quality and biological assessments (in-stream), wetlands, sub-watersheds, river corridors (buffered or not) and geomorphology. Map the existing and new data on one regional map.
    b. Revise Plans and Bylaws and Ensure Enforcement -- Incorporate the above data into municipal plans; establish specific statements that protect these resources; develop clear standards for how to protect these resources within zoning regulations; and initiate on-going enforcement of the regulations. Encourage low impact development techniques, and shared storm water control programs to maximize land development in areas planned for growth. Incentivize best management practices for agricultural uses; and encourage the Agency of Agriculture to better enforce their required agricultural practices. In addition, EPA's DRAFT Lake Champlain Total Maximum Daily Load (TMDL) for phosphorus, Vermont's Phase 1 TMDL Implementation Plan, and the Vermont Clean Water Act (2015 Act 64) have established a variety of regulatory programs to address phosphorus reduction. CCRPC will work with the municipalities and other partners to implement these programs: Municipal Roads General Permit, Phosphorus reduction integration into the existing MS4 permit, and Developed Lands (3 or more acres of impervious). See Chittenden County's Work Plan and the 2016 All Hazard Mitigation Plan (in development) for more detail on these actions.
    c. Implement Non-regulatory approaches - Identify and implement non-regulatory approaches to nutrient, pathogen and sediment pollution management. Under new MS4 permit requirements, municipalities will be developing flow restoration plans to achieve the total maximum daily load requirements for impaired streams, rivers, and Lake Champlain. These plans may require additional public investment in storm water facilities or investments or actions by individual property owners. Support watershed organizations.

3. **Wastewater Treatment Plant Upgrades** – The non-point sources have been identified as the largest contributors of phosphorus to Lake Champlain, and therefore Vermont's August 2015 *Draft* Lake Champlain Phosphorus TMDL Phase I Implementation Plan, does not allocate any additional phosphorus reductions to wastewater treatment plants in the Lake Champlain basin. However, EPA's *Draft* Phosphorus TMDLs for Vermont Segments of Lake Champlain, dated August 14, 2015, does include reductions at some of the County's wastewater treatment plants as identified in Table 9 of that document. These treatment plants are listed in the ECOS/CEDS Project List (in

iv. Aggregate these locally important forest blocks, wildlife habitat and associated resources into a regionally significant map so that we can see these resources across municipal boundaries and work together to protect them.

b. Resource Protection Audit – Identify what resources are being protected and to what standard. Map this information based on tiers of resources based on scale (i.e. small scale rare species locations and wetlands versus landscape scale forest blocks) and protection standards. Small scale resources may require higher standards, where landscape scale resources may accommodate some development and require less protective standards to maintain functions and values.
c. Municipal Development Review Regulations - Develop clear definitions of the resources to be protected and establish standards to describe how to protect these resources within zoning and subdivision regulations.
d. Education - Educate engineers, developers, real estate professionals, planners and the public regarding resources and methods for restoration and protection.
e. Non-regulatory Protection - Support non-regulatory conservation and/or preservation through public and land trust investments. Establish invasive plant removal management plans, implement the plans and include long-term monitoring.
f. To protect significant habitats, development should be located to avoid state and local known constraints that have been field verified, and to minimize impacts to state and local possible constraints that have been field verified.
    - State and Local Known Constraints, as protected by municipalities and State agencies, are shown on Map 9 and include the following: State - significant natural communities and rare threatened and endangered species, vernal pools (unconfirmed and confirmed), and Class 1 and Class 2 Wetlands, Local Known Constraints: see constraint tables under the description of Map 9 in Supplement 3.
    - Possible State and Local Constraints, as protected by municipalities and State agencies, are shown on Map 9 and include the following: Protected Lands (state lands in fee simple ownership and privately conserved land), deer wintering areas, the Agency of Natural Resources Vermont Conservation Design Highest Priority Forest Blocks, Local Possible Constraints: see constraint tables under the description of Map 9 in Supplement 3.

2. **Working Lands Implementation** – To preserve the soul of Vermont, as well as move forward into the future with resiliency, Vermont needs to protect the farmland and forestland we have and support existing and new operations (including, but not limited to, un-intensive urban and suburban home gardens and mini-homesteads). Support implementation of the Farm to Plate Strategic Plan and the VT Working Landscape Partnership Action Plan.
    a. Municipal Development Review Regulations - Develop clear definitions of working lands to be protected and establish zoning and subdivision standards to describe how to protect these areas from development so that they may be retained and accessible as “working” lands. Maintain access and scale of working lands to ensure