

Equity, Benefits, and Burdens

Priority Populations

Advancing equity in the planning context requires us to identify populations that may face disproportionate benefits and burdens that can be exacerbated or rectified by our planning work. In Vermont, this identification is informed by State law, which provides a standardized definition for populations warranting focused consideration in planning and decision-making.

Vermont Act 154 of 2022 defines Environmental Justice Focus Populations (EJFP): any census block group in which:

- ✦ The annual median household income is not more than 80% of the State median household income;
- ✦ Persons of Color and Indigenous Peoples comprise at least 6% or more of the population; or,
- ✦ at least 1% or more of households have limited English proficiency. Limited English proficiency means that a household does not have a member 14 years or older who speaks English “very well” as defined by the U.S. Census Bureau.

DATA ANALYSIS

Mapping

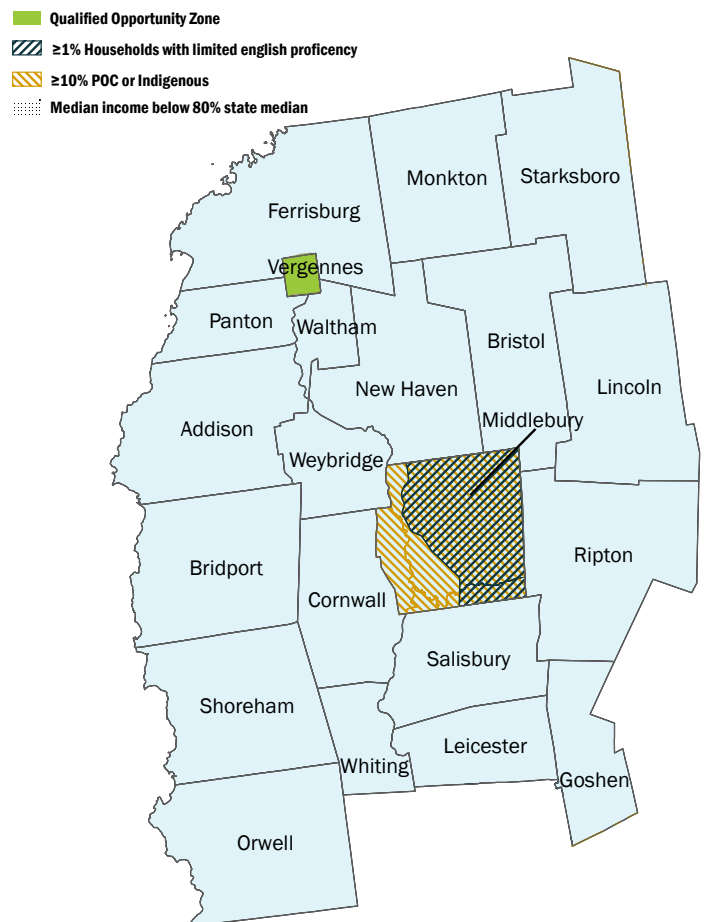
ACRPC mapped the environmental focus group populations as defined in 3 V.S.A. § 6002(4) and made two adjustments to better identify disproportionate impacts in the Region. The first adjustment expanded the threshold for identifying BIPOC populations. Using the definition of environmental justice focus populations found in 3 V.S.A §6002(4)(B) resulted in all but five census blocks in the region being considered focus populations. ACRPC adjusted this definition to identify areas where more than 10% of residents are BIPOC.

The second adjustment expanded the methods for identifying economically distressed populations. ACRPC adjusted the median household income requirement in 3 V.S.A §6002(4)(A) by including current Federal Opportunity Zones. Opportunity Zones are an economic development tool that allows people to invest in distressed areas in the United States. In the 2024

American Community Survey (ACS), no census blocks in the Region had a median income less than 80% of the State median household income. However, Opportunity Zones were created using 2018 ACS data identifying census blocks with a median income less than 80% of the State median household income. ACRPC used Opportunity Zones to identify census blocks that recently had a median income less than 80% of the State median household income and are still identified as economically distressed areas by the Internal Revenue Service and the U.S. Department of Housing and Urban Development.

The map below demonstrates the distribution of the EJFP populations throughout the Region.

The Vermont Environmental Justice Law (Act 154), passed in 2022, defines environmental justice and requires state agencies to implement environmental justice policies. 24 V.S.A §4348 and 24 V.S.A.



DRAFT 6-10-26 | Public Hearing

§4345a requires the regional planning commissions to assess the distribution of environmental benefits and burdens as defined under the Environmental Justice Law (V.S.A. Title 3 Chapter 72). The law directs particular focus on mitigating disproportionate impacts on environmental justice focus populations.

ENVIRONMENTAL JUSTICE KEY DEFINITIONS (3 V.S.A. § 6002)

- ✦ **Environmental benefits:** the assets and services that enhance the capability of communities and individuals to function and flourish in society. Examples of environmental benefits include access to a healthy environment and clean natural resources, including air, water, land, green spaces, constructed playgrounds, and other outdoor recreational facilities and venues; affordable clean renewable energy sources; public transportation; fulfilling and dignified green jobs; healthy homes and buildings; health care; nutritious food; Indigenous food and cultural resources; environmental enforcement; and training and funding disbursed or administered by governmental agencies.
- ✦ **Environmental burdens:** any significant impact to clean air, water, and land, including any destruction, damage, or impairment of natural resources resulting from intentional or reasonably foreseeable causes. Examples of environmental burdens include climate change impacts; air and water pollution; improper sewage disposal; improper handling of solid wastes and other noxious substances; excessive noise; activities that limit access to green spaces, nutritious food, Indigenous food or cultural resources, or constructed outdoor playgrounds and other recreational facilities and venues; inadequate remediation of pollution; reduction of groundwater levels; increased flooding or stormwater flows; home and building health hazards, including lead paint, lead plumbing, asbestos, and mold; and damage to inland waterways and waterbodies, wetlands, forests, green spaces, or constructed playgrounds or other outdoor recreational facilities and venues from private, industrial, commercial, and government operations or other activities that contaminate or alter the quality of the environment and pose a risk to public health.

- ✦ **Environmental justice:** all individuals are afforded equitable access to and distribution of environmental benefits; equitable distribution of environmental burdens; and fair and equitable treatment and meaningful participation in decision-making processes, including the development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice recognizes the particular needs of individuals of every race, color, income, class, ability status, gender identity, sexual orientation, national origin, ethnicity or ancestry, religious belief, or English language proficiency level. Environmental justice redresses structural and institutional racism, colonialism, and other systems of oppression that result in the marginalization, degradation, disinvestment, and neglect of Black, Indigenous, and Persons of Color. Environmental justice requires providing a proportional amount of resources for community revitalization, ecological restoration, resilience planning, and a just recovery to communities most affected by environmental burdens and natural disasters.

When considering equity in our planning work, ACRPC focuses on the populations listed above while recognizing that the rural nature of the region can result in inequitable distribution of benefits and burdens as well. Although a source of pride and community vitality, rural areas often isolate those most in need of cultural, physical, financial, and other resources or support. While spatial data may not be sufficiently granular to capture impacts on these individuals, ACRPC remains deeply aware of the challenges faced by residents in rural areas and especially those who are low income.



Plan Benefits and Burdens Assessment

This Plan adapts the methodology used by Chittenden County Regional Planning Commission (CCRPC) and Northwest Regional Planning Commission (NRPC) for this section. In particular, in an effort to ensure compatibility across regional plans, this section utilizes the definitions for each chosen issue area from the CCRPC example, and the disproportionate impact analysis strategy created by NRPC.

Vermont Statute defines 36 examples of environmental benefits or burdens (24 V.S.A. §4345a). ACRPC grouped similar benefits and burdens into a list of 18 that could be impacted by the Regional Plan, which are described below. Where possible, data indicators are utilized to determine if priority populations receive disproportionate impacts when compared to the Region as a whole. To ensure this Plan considers potential disproportionate impacts on any portion of the community beyond EJFP, major differences between municipalities and the region as a whole are also noted.

ACCESS TO HEALTHY AIR / AIR POLLUTION

Definition: Access to healthy air means breathing air that is clean and free from harmful levels of pollutants, supporting overall health and well-being. Exposure to air pollution occurs when people regularly breathe air containing harmful substances like fine particulate matter, ozone, and nitrogen dioxide.

Relevance to Plan

This Plan and following municipal planning influences where and how transportation and building infrastructure is updated. These are critical sources of harmful pollutants. Additionally, this plan informs the development of public green spaces that provide opportunities for all community members to access clean air.

Disproportionate Impact Assessment

Measure: % of population with >80th percentile PM2.5 concentration in their census tract. (Source: EPA EJ Screen Tool)

- **Regional Value:** 15% of the Region has a PM2.5 concentration greater than 80th percentile.
- **EJFP impact:** None, EJFP communities experience similar levels of particulate matter pollution to the region as a whole. Vergennes ranks in the 60th percentile while Middlebury reports between 72nd and 56th percentile with the higher values reported in the census blocks in the downtown area.
- **Other communities impacted:** Whiting, Cornwall, Bridport, Orwell, and Shoreham all report in the 90th percentile on PM2.5 concentration.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 7, Obj 1 A-D
- Energy: Goal 4, Obj 1 A-B
- Transportation: Goal 2, Obj 4A
- Transportation: Goal 3, Obj 1C,
- Transportation: Goal 3, Obj 3A

Benefits and Burdens Discussion

Air quality data is not available at a level to identify specific areas within the Region impacted by air quality issues. However, this Plan does consider that community members living near high-traffic areas, in homes with particulate-producing energy systems, or in older buildings often experience disproportionate air quality burdens. Proper weatherization can address indoor air quality issues such as mold while improving energy efficiency. Given Vermont's current energy mix, communities outside Vermont frequently bear the environmental costs of energy generation while the Addison Region enjoys reliable power. This Plan addresses these inequities by promoting cleaner transportation, heating and electric energy, expanding active and public transportation options, supporting energy efficiency upgrades and local renewable energy development, and ensuring all residents have access to green outdoor spaces and the clean air they provide.

ACCESS TO GREEN SPACES AND RESOURCES

Definition: Access to green spaces such as public recreation sites, trails, and conserved lands create potential opportunities for people to use and benefit from land. Land access means having the opportunity to use, manage, or benefit from land for housing, agriculture, recreation, cultural practices, or conservation. When access is limited by high costs, restrictive zoning, environmental degradation, or legal and historical barriers, it can lead to displacement, loss of livelihoods, reduced food sovereignty, and fewer opportunities for cultural and community activities.

Relevance to Plan

This Plan provides guidance on where future conservation, recreation, and development projects may occur. Therefore, consideration of the existing distribution of these resources is necessary to identify high priority projects in the future.

Disproportionate Impact Assessment

Measure: Number of public recreational sites per 1,000 population (VT Outdoor Recreation Sites Inventory)

- **Regional Value:** The Region hosts approximately 5.2 recreational sites per 1000 population.
- **EJFP impact:** Burden - Middlebury and Vergennes host 2.73 recreational sites per 1000 population.
- **Other communities impact:** 11 of the 21 towns have fewer sites per population than the Region as a whole. In contrast, Goshen (40.7 sites/1000 population), and Ripton (18.9 sites/1000 population), have significantly more. Waltham has no recreation sites listed.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 3, Obj 1A
- Natural Resources: Goal 9, Obj 1-4, all actions
- Transportation: Goal 3, Obj 2A
- Community Infrastructure: Goal 3, Obj 3A-C
- Housing: Goal 3, Obj 1A
- Economic Development: Goal 4, Obj 2A-E
- Land Use: Goal 1, Obj 4A-C

Benefits and Burdens Discussion

The Addison Region offers residents many opportunities to access green spaces. Much of the eastern border of the Region hosts nation and state-owned lands open to the public, while the western border of the Region is along Lake Champlain. Throughout the Region there are many town forests, parks, and other green spaces. However, this Plan recognizes that not all communities feel able to utilize these resources due to differences in wealth, culture, or ability. For example, most of Lake Champlain shoreline is owned privately, with a limited number (13) of free public access points. Additionally, these major green spaces are a significant distance from the two EJFP areas in Vergennes and Middlebury.

However, what Vergennes and Middlebury lack in number of amenities, may be overcome by the amenities they are able to offer. Both have municipal recreation departments supporting a number of programs. Middlebury also benefits from the Trail Around Middlebury (TAM), which provides access to a 17-mile trail network that surrounds Middlebury's village, putting walking trails within walking distance of anyone that desires to use them. This Plan also recognizes that unsustainable development of recreational or working lands reduces the environmental benefits for future residents. Therefore, relevant policies from this Plan on this issue involve ensuring resources are sustainably developed and managed, distributed throughout the Region, and new green spaces are made available to a broad range of ages, abilities, incomes, and backgrounds.

ACCESS TO TRANSPORTATION

Definition: Access to transportation refers to the ability to reach essential destinations (such as jobs, schools, healthcare, and grocery stores) safely, affordably, and efficiently by a variety of modes, including walking, biking, public transit, and driving.

Relevance to Plan

This Plan identifies areas in need of improvement to ensure transportation infrastructure is able to meet the needs of the future.

Disproportionate Impact Assessment

Measure: % of population with transit stop in municipality (Tri-Valley Transit)

- **Regional Value:** 66% of the Region's population has a transit stop within their municipality.
- **EJFP impact:** Benefit – 100% of EJFP have a transit stop in their municipality.
- **Other communities impacted:** only 9 towns have transit stops, leaving the smaller more rural communities unserved.

ACRPC Policies Addressing this Issue

- Transportation: Goal 2, Obj 6A-B
- Transportation: Goal 3, Obj 1A-C
- Transportation: Goal 3, Obj 2A
- Transportation: Goal 4, Obj 1
- Transportation: Goal 4, Obj 2A-C
- Land Use: Goal 1, Obj 2B

Benefits and Burdens Discussion

Transportation options are deeply connected to equity and opportunity. The Addison Region is a rural area where transportation has traditionally been dominated by personal vehicles. People with lower incomes may lack access to personal vehicles and face limited or no public transit options, particularly in rural areas. Elderly individuals, people with disabilities, or those with visual impairments may not be able to drive and are vulnerable to poor or nonexistent sidewalk infrastructure and transportation options that aren't designed for their mobility needs. Limited public transit schedules and

unreliable transportation options mean people without vehicles must make difficult choices between accessing jobs with non-traditional hours, arriving late to work and risking job loss, or missing medical appointments and other essential activities. The cost of vehicle ownership, maintenance, insurance, and fuel consumes a larger percentage of income for low-wage workers, while geographic isolation in rural communities means longer distances to essential services with fewer transportation alternatives. Therefore, this Plan promotes further development of accessible public transportation, better active transportation infrastructure, complete streets design, improved connectivity between rural and urban areas, and directing new development to village centers to limit the distances people need to travel for work and other amenities.

HEALTHY ECOSYSTEMS / DAMAGE TO FORESTS

Definition: Healthy ecosystems are natural environments that support biodiversity, clean air and water, climate resilience, and human well-being. Access to these ecosystems provides health, recreational, cultural, and spiritual benefits, while also providing ecosystem services like flood control and carbon storage.

Relevance to Plan

This Plan identifies areas of significant ecological value, promotes activities to protect or improve natural resources, and identifies opportunities for infrastructure to improve accessibility to these resources.

Disproportionate Impact Assessment

Measure: % change in forestland cover between 2016 and 2022 (VCGI - Vermont Land Cover Change)

- **Regional Value:** The region lost about 0.2% of forestland cover
- **EJFP impact:** Benefit - EJFP areas lost 0.1% of forestland cover.
- **Other communities impacted:** There is a negligible change in forestland cover across the Region.

ACRPC Policies Addressing this Issue

- Natural Resource: Goal 4, Obj 1-3, all actions
- Natural Resource: Goal 5, Obj 1A-I
- Natural Resource: Goal 5, Obj 2A
- Land Use: Goal 1, Obj 4A-C
- Flood Resilience: Goal 1, Obj 2A

Benefits and Burdens Discussion

The Addison Region’s diverse ecosystems—including forests, wetlands, rivers, and agricultural lands—provide essential benefits to residents and communities and easy access to healthy ecosystems. However, access to these benefits is not equally distributed across all populations. Lack of transportation or proximity to parks, forests, and natural areas means some communities cannot access the recreational and mental health benefits of nature. Development and environmental degradation disproportionately occur in areas inhabited by low-income communities, reducing their access to ecosystem services like flood control and clean water. Elderly individuals and people with disabilities may face physical barriers to accessing natural areas that lack accessible trails, facilities, or transportation options, while wealthier communities often have better-maintained green spaces and tree canopy coverage, providing more cooling, air filtration, and recreational opportunities. Therefore, this Plan promotes accessible recreation infrastructure during development, protects and improves ecosystem vitality throughout the Region, and directs development away from sensitive ecosystems to ensure all residents can benefit from healthy natural areas.

ACCESS TO HEALTHCARE

Definition: Access to healthcare means having timely, affordable, and geographically accessible medical services. Limited access can result in delayed care, worsened health outcomes, and increased health disparities.

Relevance to Plan

This Plan identifies preferred locations for future development of housing and other infrastructure. The proximity of new housing to healthcare services or to reasonable transportation to access those services should be considered during the planning process.

Disproportionate Impact Assessment

Measure: % of population with federally qualified healthcare center in municipality (VT Department of Health Public Health Reference Map)

- **Regional Value:** 35.2% of the Region’s population has a qualified healthcare center in their municipality.
- **EJFP impact:** Benefit - 78.2% of EJFP have a qualified healthcare center in their municipality.
- **Other communities impacted:** Only two municipalities (Bristol and Middlebury) in Addison Region have a qualified healthcare center.

ACRPC Policies Addressing this Issue

- Economic Development: Goal 4, Obj 4A-D
- Community Infrastructure: Goal 1, Obj 1A

Benefits and Burdens Discussion

Access to healthcare services in the Addison Region is shaped by geographic and economic barriers that disproportionately affect vulnerable populations. Rural communities often lack nearby hospitals, specialists, and emergency services, requiring long travel times that can be life-threatening in emergencies. People without health insurance or with high-deductible plans may delay or forgo necessary care due to cost, while limited public transportation and lack of personal vehicles create barriers to reaching medical appointments, particularly for elderly individuals and people with disabilities. Therefore, this Plan supports directing new development closer to healthcare amenities and advocating for greater public transportation and active transportation infrastructure to improve access to healthcare services for all residents.



CLIMATE CHANGE IMPACTS

Definition: Climate impacts refer to the increasing frequency and severity of hazards such as flooding, heat-waves, storms, and droughts driven by climate change.

Relevance to Plan

The severity of climate change impacts felt by individual residents often depend on the local landscape and infrastructure. This Plan identifies qualities of climate resilient communities and supports development of effective adaptation efforts.

Disproportionate Impact Assessment

Measure: % of population that’s in an area >75th percentile nationwide for building loss

- **Regional Value:** 0% of the Regional population
- **EJFP impact:** 0% of the EJFP population
- **Other communities impacted:** N/A

ACRPC Policies Addressing this Issue

- Transportation: Goal 5, Obj 1A
- Community Infrastructure: Goal 2, Obj 3A-B
- Community Infrastructure: Goal 4, Obj 3A-B
- Flood Resilience: Goal 1, Obj 1A
- Flood Resilience: Goal 1, Obj 2A
- Flood Resilience: Goal 1, Obj 3A
- Land Use: Goal 1, Obj 2B

Benefits and Burdens Discussion

Addison County is an agricultural region bordered to the east by the Green Mountains. The communities located in the mountains and along the mountain escarpment are prone to fluvial erosion due to flooding, while the agricultural producers in lower, valley communities are more likely to suffer climate impacts related to extreme heat and drought. Residents and business owners who cannot afford to relocate away from hazardous flood zones or invest in sufficient cooling technology are more likely to suffer the consequences of climate change impacts. This Plan works to ensure new development is located away from streams, and that all developed areas are built with resilient infrastructure, such as sufficient greenspace capable of minimizing extreme heat and efficient storm water systems, to manage the most likely effects of climate change in this Region.

ACCESS TO CLEAN WATER / WATER POLLUTION

Definition: Access to clean water means having safe, reliable, and affordable water for drinking, cooking, sanitation, and recreation. Water pollution occurs when harmful substances contaminate water sources, making them unsafe for human use or ecological health.

Relevance to Plan

As the Clean Water Service Provider for the Otter Creek Basin, ACRPC is responsible for identifying opportunities for investment in water quality improvement projects.

Disproportionate Impact Assessment

Measure: % of dwellings located within an impaired watershed (VT ANR Priority Waters List)

Regional Value: Otter Creek is the primary watershed of the Addison Region and is considered impaired under the Lake Champlain TMDL. Therefore, 86% of the Region’s dwellings are located in an impaired watershed.

EJFP impact: 100% of the EJFP dwellings are located in an impaired watershed.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 1, Obj 1A-H
- Natural Resources: Goal 1, Obj 2A-B
- Natural Resources: Goal 1, Obj 3A
- Natural Resources: Goal 1, Obj 4A-B
- Natural Resources: Goal 2, Obj 1A-C
- Natural Resources: Goal 2, Obj 2A-C
- Natural Resources Goal 3, Obj 3B
- Natural Resources: Goal 4, Obj 3F
- Transportation: Goal 6, Obj 1A
- Community Infrastructure: Goal 5 Obj 1-3, All actions
- Housing: Goal 1, Obj 4A-C
- Housing: Goal 2, Obj 2A-B
- Economic Development: Goal 3, Obj 3A-B
- Land Use: Goal 1, Obj 2 B

Benefits and Burdens Discussion

The Addison Region must plan for and support the development of effective wastewater management and provision of clean water. Much of the Region lacks access to municipally managed wastewater or drinking water systems, leaving many residents reliant on private septic systems and wells. Leaky septic tanks are expensive to maintain or replace, creating a significant financial burden for lower-income residents, while those without proper water filtration systems may not have access to water that meets acceptable quality standards. Therefore, this Plan supports ongoing water quality monitoring and education on safe places to recreate, assistance with septic system improvements and maintenance, and the development of municipal wastewater and drinking water infrastructure within the Region's villages. It also supports the continued implementation of Clean Water Service Provider projects to further improve water quality and protect ecological functions.

INCREASED FLOODING AND EROSION

Definition: Increased flooding and erosion risk refers to the compounded vulnerability of land, property, and infrastructure to damage from intense storms, inadequate stormwater management, and accelerated soil loss. These risks create a cascading cycle where flooding washes away soil and vegetation, reducing the land's ability to absorb water and causing more severe flooding. Flooding can be exacerbated by development in vulnerable areas, deforestation, and poor land management. The consequences include property damage, infrastructure failure, ecosystem degradation, sedimentation in waterways, and threats to both human communities and natural environments.

Relevance to Plan

This Plan identifies strategies to support resilient infrastructure, agriculture, and ecosystems that reduce erosion and identifies areas at risk of future increased flooding. Erosion is also relevant to the work of ACRPC in its role as the Clean Water Service Provider.

Disproportionate Impact Assessment

Measure: % of dwellings in 100-year to 500-year floodplain (FEMA FIRM Maps).

- **Regional Value:** 3% of the Region's dwellings are in a 100 to 500-year floodplain.
- **EJFP impact:** Benefit – 1.15% of the EJFP dwellings are in a 100 to 500-year floodplain.

ACRPC Policies Addressing this Issue

- Flood Resilience: Goal 1, Obj 1A
- Flood Resilience: Goal 1, Obj 2A
- Flood Resilience: Goal 1, Obj 3A
- Transportation: Goal 5, Obj 1A
- Natural Resources: Goal 1, Obj 3A
- Natural Resources: Goal 9, Obj 2B

Benefits and Burdens Discussion

The Addison Region recognizes that flooding and erosion impacts are not distributed equally across all communities. Most flooding events have impacted roads, culverts, and bridges. Housing damage is relatively rare but generally affects people with lower incomes who live in flood-prone areas, lack insurance coverage, and have less financial resilience during recovery. Further, property owners with limited resources cannot afford erosion control measures or repairs, small-scale farmers lose productive land, and culturally significant sites face destruction. Renters and mobile home residents are particularly vulnerable. People experiencing homelessness face immediate dangers, such as mobility limitations, language barriers, sensory impairments, and mental health disabilities create challenges with evacuation and access to emergency information. Therefore, this Plan supports equitable emergency preparedness and response systems, flood-resilient infrastructure and mitigation, better stormwater management, hardened infrastructure against erosion, support for at-risk community members in implementing erosion control measures, and agricultural practices that increase erosion resilience to protect all residents regardless of income, ability, or background.

INADEQUATE REMEDIATION OF POLLUTION

Definition: Inadequate remediation of pollution refers to insufficient cleanup or management of contaminated sites, such as brownfields, hazardous waste sites, or areas with soil or water contamination. This can prolong exposure to harmful substances and limit safe use of affected land.

Relevance to Plan

This Plan identifies potential sources of contamination and opportunities for redevelopment of remediated land.

Disproportionate Impact Assessment

Measure: % of dwellings within 0.5 miles of an unremediated brownfield location (VT ANR Brownfield Sites)

- **Regional Value:** 0% of Regional dwellings.
- **EJFP impact:** 0% of EJFP dwellings.
- **Other communities impacted:** As of January 2026, there are no reported unremediated brownfield locations in the Region.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 1, Obj 1A, H
- Natural Resources: Goal 2, Obj 2A-C
- Economic Development: Goal 3, Obj 1C

Benefits and Burdens Discussion

The Addison Region has a limited number of contaminated sites due to limited industrial history and previous cleanup efforts. Brownfields and contaminated resources tend to reduce property values, making it more likely for low-income individuals to live nearby and receive a disproportionate negative impact. To address these concerns, the Plan supports the remediation and redevelopment of brownfield sites while also protecting water resources and addressing contamination through comprehensive water quality policies.

HEALTHY HOMES:

HOME AND BUILDING HEALTH HAZARDS

Definition: Healthy buildings and homes especially are safe, stable, and well-maintained living environments that protect residents from environmental hazards such as mold, lead paint, asbestos, poor ventilation, or inadequate heating and cooling. When homes are affordable and readily available, they support long-term physical and mental well-being by reducing housing stress and ensuring that all residents have access to safe and healthy shelter.

Relevance to Plan

This Plan identifies strategies for constructing new homes and renovating existing structures with safer building materials, implementing flood resilient development practices, reducing environmental hazards, and expanding the Region's housing stock.

Disproportionate Impact Assessment

Measure: % of population with a housing burden greater than 50% of income. Households are considered housing cost burdened if they spend more than 30% of income on housing (2020 U.S. Census)

- **Regional Value:** 11% of Regional households spend more than 50% of their income on housing.
- **EJFP impact:** Benefit – 10% of Vergennes EJFP are severely housing cost burdened. Burden – 14% of Middlebury EJFP are severely cost burdened.
- **Other communities impacted:** More than 20% of households in Goshen (27%) and Whiting (22%) spend 50% or more of their income on housing.

ACRPC Policies Addressing this Issue

- Energy: Goal 2, Obj 2A
- Energy: Goal 2, Obj 3A-D
- Housing: Goal 1, Obj 3A-B
- Housing Goal 2, Obj 1A-C
- Land Use: Goal 1, Obj 1B
- Flood Resilience: Goal 1, Obj 1A

Benefits and Burdens Discussion

Income plays an important role in accessing healthy housing in the Addison Region. Due to current housing stock limitations, there are very few options for lower-income residents to seek better housing when their current situation is unhealthy or inadequate. Low-income renters and mobile home residents are more likely to live in older, poorly maintained buildings with mold, lead paint, asbestos, and inadequate heating or cooling systems, and often cannot afford necessary repairs or improvements. Renters may lack power to demand repairs or improvements from landlords, forcing

them to live in unhealthy conditions or risk eviction for complaints. Children in homes with lead paint, mold, or poor air quality face heightened risks of developmental issues, asthma, and other health problems, while elderly individuals and people with respiratory conditions or weakened immune systems are particularly vulnerable to these conditions. Without sufficient housing alternatives, residents may be forced to remain in substandard conditions that compromise their health and well-being. Therefore, this Plan supports healthy housing by facilitating public education and access to home improvement resources and clean energy options, supporting weatherization and home repair programs to improve existing housing stock, and encouraging the development of diverse housing at various price points to ensure all residents have the ability to access alternative housing if their current situation is not suitable.

ACCESS / LIMIT TO NUTRITIOUS FOOD

Definition: Access to nutritious food means having reliable availability of affordable, healthy, culturally appropriate food within a reasonable distance. Limited access, also known as food insecurity or living in a ‘food desert,’ can lead to poor nutrition, diet-related diseases, and reduced quality of life.

Relevance to Plan

This Plan directs development and future land use, while also encouraging the agriculture and local economic activity.

Disproportionate Impact Assessment

Measure: Grocery store or general store within 5 miles of residences (VT E911 Site locations).

- **Regional Value:** 75.3% of the Region’s residents are within 5 miles of a general or grocery store.
- **EJFP impact:** Benefit - 100% of EJFP areas are within 5 miles of a general or grocery store.
- **Other communities impacted:** Goshen (84%) and Whiting (100%) have higher than average percent of residences that are more than 5 miles from a grocery store or general store.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 3, Obj 4A-B
- Natural Resources: Goal 3, Obj 5A-C
- Economic Development: Goal 2, Obj 3A
- Land Use: Goal 1, Obj 5A-C

Benefits and Burdens Discussion

The Addison Region has traditionally been an agricultural hub of the state and continues to produce nutritious local produce available to residents who can access it. Low-income and rural communities lack access to local, affordable grocery stores with fresh produce and healthy options. People without personal vehicles or adequate public transportation may face difficulty traveling to supermarkets, particularly in rural areas with greater distances. Therefore, this Plan supports mixed-use development in compact village centers to enable easier access to resources like food, protects local food production by advocating for farmers’ needs and promotes food assistance programs that distribute local produce to those in need.

EXCESSIVE NOISE

Definition: Excessive noise refers to prolonged or intense sound levels that disrupt daily life, harm health, or reduce quality of life. Common sources include traffic, airports, industrial facilities, and construction. Noise pollution can lead to stress, sleep disturbance, hearing loss, and cardiovascular issues.

Relevance to Plan

This Plan directs transportation infrastructure upgrades and encourages the use of quieter modes of transportation.

Disproportionate Impact Assessment

Measure: % of population with >50th percentile traffic proximity in their municipality. (EPA EJ Screen Tool)

- **Regional Value:** 27% of the Region’s population lives in a municipality reporting more than 50th percentile in traffic proximity.
- **EJFP impact:** Burden – Middlebury EJFP ranks in the 50-80th percentile for traffic proximity. Vergennes EJFP is below the 50th percentile.
- **Other communities impacted:** Weybridge also falls into the 50-80th percentile.

ACRPC Policies Addressing this Issue

- Transportation: Goal 2, Obj 4A
- Transportation: Goal 3, Obj 1A-C
- Transportation: Goal 3, Obj 2A-C

Benefits and Burdens Discussion

The rural nature of the Addison Region ensures that a majority of the Region is relatively quiet, but it is important to consider where noise pollution might impact components of the community differently. In the Addison Region, low-income communities may be more likely to live near highways and rail lines that generate intermittent high noise levels. Renters and those unable to afford soundproofing or home improvements may experience greater health impacts from noise pollution. Children in noisy environments may experience learning difficulties and reduced concentration, while elderly individuals and people with certain health conditions may face heightened risks of cardiovascular problems and cognitive decline from prolonged noise exposure. Wealthier neighborhoods typically have lower noise levels due to zoning protections, green spaces, and distance from noise sources. Therefore, this Plan promotes electric vehicles and active transportation alternatives that produce less noise, encourages improved freight transport located away from downtowns and residential areas, (e.g. the recently completed Planning and Environmental Linkage Study for the City of Vergennes addressing truck traffic in its downtown), and ensures access to green spaces that can provide respite from noise pollution.

FULFILLING AND DIGNIFIED JOBS

Definition: Access to fulfilling and dignified jobs means having employment opportunities that provide fair wages, safe working conditions, respect, and opportunities for growth and advancement. Limited access can result in economic insecurity, reduced well-being, and lack of career mobility.

Relevance to Plan

This Plan supports future economic development and advocates for workforce training efforts.

Disproportionate Impact Assessment

Measure: The average 2024 % unemployment rate reported by Bureau of Labor Statistics.

- **Regional Value:** The Regional average unemployment rate in 2024 was 2.1%.
- **EJFP impact:** Burden – EJFP areas have unemployment rates higher than that of the Region with 2.2% in Middlebury and 3.3% in Vergennes. Please note that Vergennes does not have a record in BLS data sets as a small city and unemployment was estimated from American Community Survey data.
- **Other communities impacted:** Leicester, Orwell, Panton, Ripton, Shoreham, and Starksboro all had higher unemployment rates in 2024 than the Regional average.

ACRPC Policies Addressing this Issue

- Economic Development: Goal 1, Obj 1A-E
- Economic Development: Goal 1, Obj 2A
- Economic Development: Goal 1, Obj 3A
- Economic Development: Goal 4, Obj 1A-B

Benefits and Burdens Discussion

Access to quality employment may be unevenly distributed across the Addison Region. People with lower educational attainment or those unable to afford higher education may face limited access to higher-paying jobs with benefits and advancement opportunities. Geographic isolation in rural areas means fewer local job opportunities, requiring long commutes or relocation that may not be financially feasible. People with disabilities may face workplace discrimination, lack of accommodations, and limited hiring opportunities despite qualifications. Immigrants and non-English speakers may be relegated to low-wage jobs regardless of previous education or experience due to language barriers and credential recognition issues. Lack of affordable childcare forces parents, particularly single mothers, to choose lower-quality jobs with flexible hours over higher-paying opportunities with rigid schedules. Therefore, this Plan supports locating housing close to employment centers to reduce commute burdens, promoting childcare infrastructure to enable workforce participation, and supporting workforce development programs that expand access to quality employment opportunities for all residents.

ACCESS TO/DAMAGE TO INLAND WATERWAYS, WATERBODIES, AND WETLANDS

Definition: Damage to inland waterways, waterbodies, and wetlands refers to degradation caused by pollution, development, alteration of natural flow, or destruction of habitat. These ecosystems are critical for water quality, flood control, biodiversity, and recreation.

Relevance to Plan

This Plan identifies areas of significant ecological value and impaired waters and promotes activities to protect or improve these resources.

Disproportionate Impact Assessment

Measure: % change in impervious land cover 2016-2022 (VCGI - Vermont Land Cover Change)

- **Regional Value:** The Region experienced 15.3% in impervious land cover change.
- **EJFP impact:** Benefit – EJFP communities experienced 8.1% in impervious land cover change.
- **Other communities impacted:** The following towns had % change in impervious land cover that was greater than the regional average: Bristol (18.7%), Cornwall (16.5%), Goshen (68.4%), Leicester (29.4%), Lincoln (37.4%), Monkton (19.1%), Ripton (57.1%), Salisbury (30%), and Starksboro (33.2%).

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 1, Obj 1-4, All Actions
- Natural Resources: Goal 3, Obj 3B
- Natural Resources: Goal 4, Obj 3F
- Transportation: Goal 5, Obj 1A
- Community Infrastructure: Goal 5, Obj 1-3, All actions

Benefits and Burdens Discussion

The Addison Region's waterways and significant wetlands provide essential ecological, economic, and cultural benefits. Degraded water quality and habitat loss can eliminate recreational fishing, swimming, and boating opportunities that low-income communities rely on for affordable recreation and affect agricultural communities who depend on healthy waterways for irrigation

and livestock. Loss of significant wetlands and alteration of waterways reduces natural flood control, disproportionately impacting communities in flood-prone areas who cannot afford flood mitigation infrastructure. Therefore, this Plan supports outreach and education on clean places to recreate, assistance with septic system improvements and maintenance to protect water quality, development of municipal wastewater and drinking water infrastructure in villages, and continued implementation of Clean Water State Revolving Fund projects to further improve water quality and protect ecological functions that benefit all residents.

AFFORDABLE & CLEAN RENEWABLE ENERGY SOURCES

Definition: Access to affordable and clean renewable energy means having access to energy sources such as solar, wind, hydroelectric, or geothermal power that are environmentally sustainable, reduce greenhouse gas emissions, and are economically accessible to all residents.

Relevance to Plan

This Plan sets targets on energy efficiency, fuel switching, and new generation in the Region.

Disproportionate Impact Assessment

Measure: Number of Efficiency Vermont recorded efficiency and weatherization projects per 1000 population between 2022 and 2024.

- **Regional Value:** About 115 efficiency and weatherization projects were completed per 1000 population in the Region.
- **EJFP impact:** Burden – Middlebury EJFP only saw about 63 efficiency and weatherization projects completed per 1000 population. Vergennes had about 125 projects per 1000 population.
- **Other communities impacted:** Monkton and Shoreham are the only other towns that have a reported number of projects per 1000 population below the regional value.

ACRPC Policies Addressing this Issue

- Energy: Goal 1, Obj 1A
- Energy: Goal 2, Obj 1A, 2A-B

- Energy: Goal 2, Obj 3A-D
- Energy: Goal 3, Obj 1A-E
- Energy: Goal 4, Obj 1A
- Energy: Goal 5, Obj 1A-B
- Energy: Goal 6, Obj 1A, Obj 2A-D

Benefits and Burdens Discussion

A detailed analysis of the burdens and benefits of the recommended Goals, Objectives, and Actions of the Energy Chapter can be found in Chapter 2 Appendix. Low-income households may be unable to afford up-front costs of solar panels, heat pumps, or energy efficiency improvements despite long-term savings. Renters and multi-unit housing residents have no control over installing renewable energy systems and often cannot benefit from energy efficiency upgrades or renewable energy sources that building owners choose not to implement. People may struggle to navigate complex incentive programs, financing options, or find contractors to complete installations. Vermont's reliance on energy produced outside the State means communities elsewhere bear the burdens of emissions and pollution from energy generation, while renewable energy development within Vermont may burden communities who lack access to decision-making processes about project siting and development. Therefore, this Plan supports education and outreach on energy and weatherization programs, advocates for energy efficiency and weatherization solutions appropriate for renters and multifamily buildings, and promotes community-owned energy systems that are accessible to residents across income levels.

ACCESS / LACK OF ACCESS TO CULTURAL RESOURCES

Definition: Access to cultural resources means having the ability to engage with and benefit from places, practices, and traditions of cultural, historical, or spiritual significance. This includes historic sites, community gathering spaces, traditional lands, and cultural institutions. Lack of access can result from physical barriers, cost, discrimination, or loss of culturally important sites.

Relevance to Plan

This Plan directs future development and advocates for protection and improvement of cultural resources.

Disproportionate Impact Assessment

Measure: Number of historic districts and buildings and archeological sites per 1000 people (VT Department of Housing and Community Development)

- **Regional Value:** The Region hosts about 2.88 historic sites per 1000 people.
- **EJFP impact:** Benefit – EJFP communities host 3.24 historic sites per 1000 people.
- **Other communities impacted:** Goshen, Leicester, and Whiting have no historic districts, projects, sites, or markers.

ACRPC Policies Addressing this Issue

- Natural Resources: Goal 3, Obj 1A
- Natural Resources: Goal 9, Obj 1-2, All actions
- Community Facilities: Goal 3, Obj 1-3, All actions

Benefits and Burdens Discussion

Cultural heritage and access to cultural resources are important components of community well-being in the Addison Region. The Region contains several known significant indigenous archeological sites and Revolutionary War sites. Accessible paths, facilities, and accommodations at historic sites and cultural venues enable people with disabilities to fully participate in cultural experiences. Communities of color seek cultural institutions that reflect their histories and cultural perspectives in welcoming environments. Rural and geographically isolated communities have fewer nearby cultural institutions and must travel longer distances to access museums, theaters, and historic sites, while elderly individuals without transportation need support to reach cultural sites and community gathering spaces that hold personal or generational significance. Therefore, this Plan supports development that is sensitive to cultural resources, preservation of historic sites throughout the Region, and promotion of cultural events and resources that are available and accessible to the entire community.

IMPROPER SEWAGE DISPOSAL OR SOLID WASTE HANDLING

Definition: Improper sewage disposal or solid waste handling occurs when wastewater or trash is not managed according to health and environmental standards, leading to contamination of soil, water, and air. This can result from failing septic systems, illegal dumping, inadequate waste collection, or poorly maintained landfills.

Relevance to Plan

This Plan supports the work of the Addison County Solid Waste Management District and promotes the development of wastewater treatment infrastructure.

Disproportionate Impact Assessment

Measure: Combined Sewer Overflows and Untreated Discharges Reported in 2025 per 1000 people (VT DEC Wastewater Management Program)

- **Regional Value:** The Region had 0.84 reported untreated discharges per 1000 people in 2025.
- **EJFP impact:** Burden – EJFP communities had 2.65 reported untreated discharges per 1000 people in 2025.
- **Other communities impacted:** There were no reported discharges outside of the Region’s two EJFP communities, Middlebury, and Vergennes.

ACRPC Policies Addressing this Issue

- Housing: Goal 1, Obj 4A-C
- Community Infrastructure: Goal 5, Obj 1-3, All actions

Benefits and Burdens Discussion

Waste management and sanitation infrastructure may create potential health and environmental burdens for some residents of the Addison Region. Low-income households may be unable to afford septic system repairs or replacements, leading to contamination of nearby wells and water bodies. Rural and geographically isolated communities often lack municipal waste collection services, requiring residents to transport trash long distances or risk illegal dumping. Renters living in properties with failing septic systems may face health risks while lacking authority to compel landlords to make necessary repairs. People without vehicles or physical ability to haul waste face challenges accessing transfer stations or disposal sites, particularly in areas without curbside pickup. Therefore, this Plan supports improved wastewater management infrastructure and education on proper septic system maintenance and waste disposal practices to protect public health and the environment.

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