

VERGENNES PLANNING AND ENVIRONMENT LINKAGES (PEL) STUDY

Initial Screening Comments and Questions

DRAFT

February 2023



1. Introduction

Between October and December 2022, VTrans and ACRPC met with various selectboards, held meetings with the Technical and Policy Committees and federal and state agency partners, and held a public meeting at the Vergennes Opera House and online. The focus of these outreach events were to share the results of the initial screening of concepts and collect stakeholder feedback. The alternatives development and screening includes developing screening criteria based on the Purpose and Need and goals, developing a range of reasonable concepts, and narrowing options and concepts through a screening process. The screening process documents the elimination of concepts to limit the need for consideration during future NEPA process(es) and identify transportation projects that will be more fully evaluated during future project development and NEPA documentation. Additional information and current and future reports can be found on the Vergennes Planning and Environment Linkages Study website (www.vergennespel.com).

This document summarizes the comments and questions received during these outreach activities. Comments and questions are paraphrased and grouped by comment themes. The comment themes are organized into three sections: questions about the alternative concepts, about the screening criteria, and a general section.

These comment themes will be considered and incorporated by the study team during the concept screening and/or throughout the PEL study, as applicable. Responses are provided for questions asked to the study team, as well as to provide context, in some cases.

2. Alternative Concepts

2.0 VERGENNES-PANTON NEW ROADWAY (BLUE ROUTE AND PINK ROUTE)

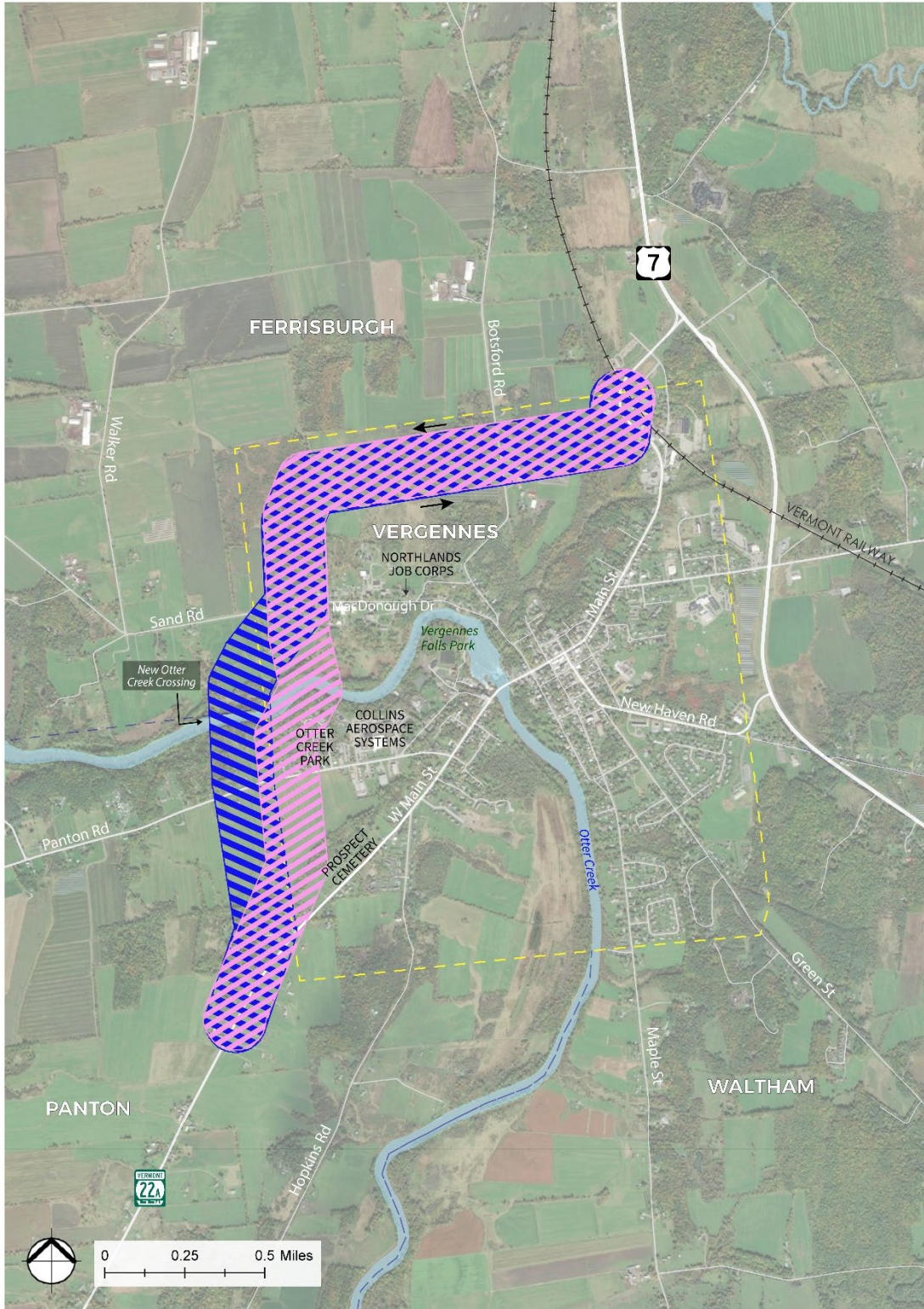
The Vergennes New Roadway Alternative (Figure 1-1) includes the construction of a new roadway within Vergennes west of Downtown. This concept connects Vermont Route 22A near the Vergennes/Panton municipal boundary with Vermont Route 22A near the Vergennes/Ferrisburgh municipal boundary. There are two options for the southern portion of the new roadway – one that is further west into Panton (Blue Route) and one that stays closer to Vergennes (Pink Route). During outreach activities, comments and questions focused on the Blue Route. However, given the overlap between the Blue and Pink Routes, the comment themes (stated below) related to the Blue Route are relevant to the Pink Route.

- Theme 1. Commenters expressed support for the Blue/Pink Routes noting various benefits such as:
- Provides a second Otter Creek Crossing
 - Perceived lesser negative impacts than other routes
 - Avoids disturbing residential area in southwest Vergennes
 - Potential for generating additional housing/development with the construction of this new roadway
 - Close proximity to Vergennes
 - Avoids displacing traffic impacts to other communities
- Theme 2. Beyond general opposition of this concept, commenters expressed the following concerns related to the Blue/Pink Routes.
- This option moves traffic to Panton and might encourage additional truck traffic on existing town roads, including Lake Street.
 - Potential for increased noise
 - Disturbance of agricultural land
 - Lack of economic growth opportunities
- Theme 3. A commenter suggested that the Blue Route travel further north to connect with Route 7 instead of Route 22A.

Response

The Blue Route, Vergennes New Roadway Alternative (West Routing Option 3) is an alternative that has been identified as a proposed bypass route in previous studies first the [Vergennes Route 22A Bypass Study\(1995\)](#), [Greater Vergennes Traffic Feasibility Study\(2002\)](#), and most recently in the [Route 22A Truck Route Study \(2019\)](#).

Figure 1-1 VERGENNES-PANTON NEW ROADWAY (BLUE & PINK ROUTE)



Theme 4. A commenter asked which town the Blue/Pink Routes would be in- in light of city/town boundary debate. Another commenter stated that the town boundary question is the biggest issue that could influence the study.

Response

VTrans is aware of differences of opinion between what is currently mapped and what was defined in the charter for the town boundary between Vergennes, Ferrisburgh, Panton and New Haven. It may have some impact on which towns may be affected by concepts being considered in the Vergennes PEL study. For the purposes of this study VTrans is using the mapped boundary data from the Vermont Center for Geographic Information (VCGI) that was originally derived from the 1:24,000 USGS topographic maps.

Theme 5. A commenter requested clarification on the Blue Route’s distance from Otter Creek Mobile Home Park.

Response

The eastern edge of the 500-foot buffer (or swath) of the Blue Route is approximately 1,000 feet from the western edge of the Otter Creek Mobile Home Park. The exact location of a new road within the buffer has not been determined.

2.1 VERGENNES MAIN STREET NEW PARALLEL ROUTE (ORANGE ROUTE)

The Vergennes Main Street New Parallel Route concept (Figure 1-2) includes the construction of a new roadway west of Route 22A. The new roadway would link Route 22A in the vicinity of the Ferrisburgh/Vergennes municipal boundary with MacDonough Drive west of Route 22A, connecting with Route 22A north of the Otter Creek Bridge.

Theme 6. Beyond general opposition of this concept, commenters expressed the following concerns with the Orange Route:

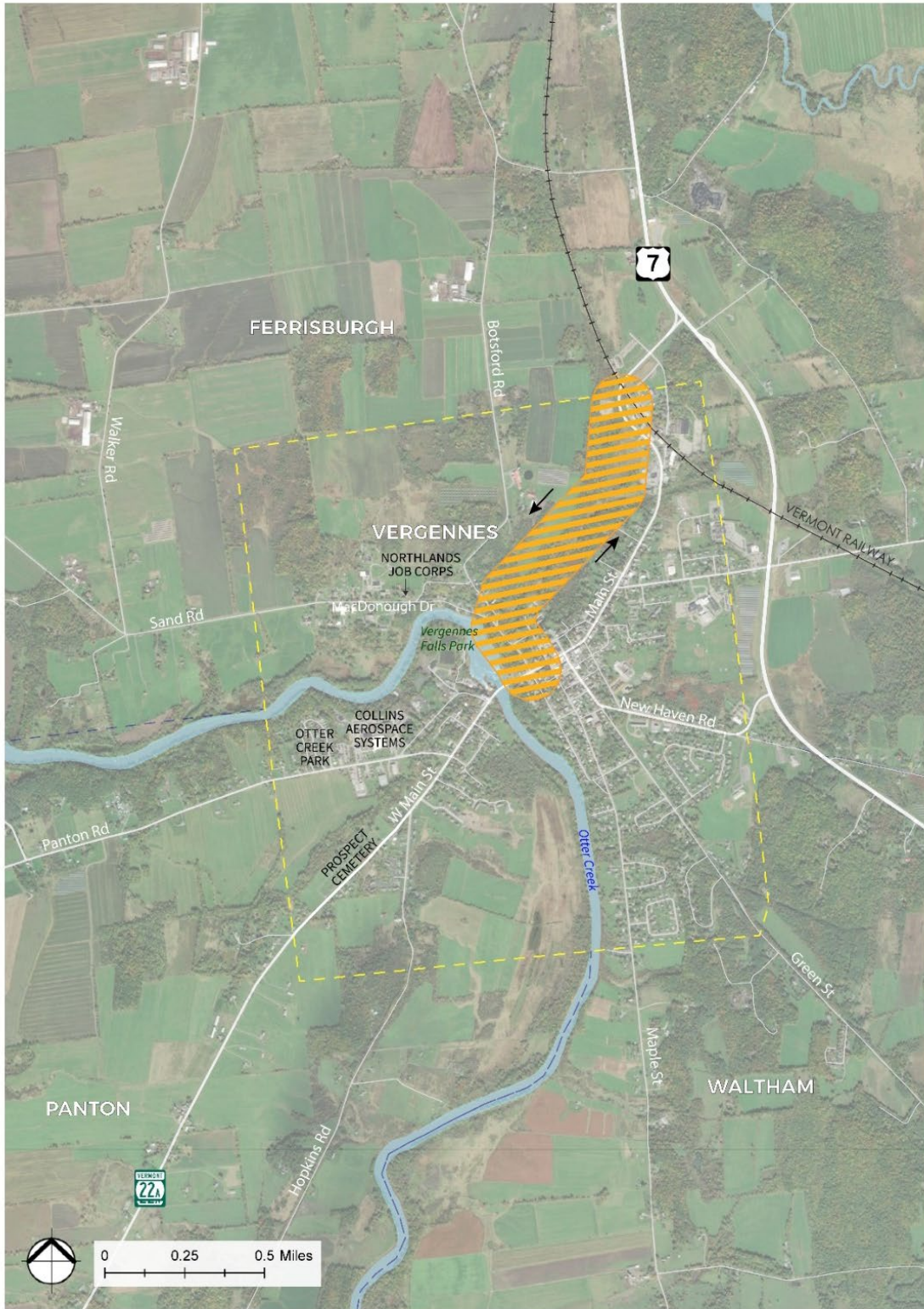
- Topographic challenges including turning movements and steep grades
- The existing bridge approaches are too steep
- Need for intersection improvements at MacDonough Drive and Main Street
- Does not address the existing pinch point at the Otter Creek Bridge
- Does not provide a new Otter Creek crossing; more resiliency is needed
- This option would only address a portion of the truck traffic/noise problem for downtown Vergennes. The route would not reduce traffic and noise south of the Otter Creek Bridge
- Does not solve the noise issues along Route 22 in Vergennes
- Concern over the safety because of poor sightlines, topographical challenges/steep grades, traffic lights, and turning movements
- Does not provide any additional opportunities for development

Theme 7. A commenter asked if the proposed Orange Route goes up Comfort Hill.

Response

While the exact location of the proposed Orange Route has not been determined, the route would generally follow MacDonough Drive to Comfort Hill and then a new roadway would connect MacDonough Drive to Main St./22A near the Vergennes-Ferrisburgh boundary.

Figure 1-2 VERGENNES MAIN STREET NEW PARALLEL ROUTE (ORANGE ROUTE)



2.2 VT-17 NORTHBOUND/VT-22A SOUTHBOUND (PURPLE ROUTE)

The VT-17 Northbound/VT-22A Southbound concept (Figure 1-3) would shift northbound truck traffic currently using Route 22A to Route 17 and U.S. Route 7, maintaining southbound truck trips on Route 22A through Vergennes.

- Theme 8. Commenters expressed support for the Purple Route. Beyond the broad and general support for the concept, many of the comments noted various benefits such as the concept:
- Is more immediately available
 - Does not require new infrastructure
 - Disturbs less property
 - Route is not as densely populated as Route 22A
 - Reroutes heavy traffic from residential areas
- Theme 9. Commenters expressed support for the Purple Route with modifications to the concept. These modifications included:
- Using Route 17 for both southbound and northbound truck travel
 - As an interim/short term solution
- Theme 10. Commenters expressed concern for the Purple Route. These concerns included:
- Does not meet the purpose and need of the study because it does not fully mitigate traffic issues and may result in new safety and environmental impacts to communities along Route 17
 - Truck traffic weight would increase loads on bridge crossings
 - Does not offer any opportunity for further economic vitality
 - Increases truck traffic volume, congestion, idling traffic at intersections, and safety hazards, including:
 - Railroad crossings along the route at the intersection of Route 17 and Route 7, and north of Route 7 and Monkton Road intersection cause bottleneck for Route 17 and Route 7
 - Steep grades at Woodman Hill, and heading north from the Route 7 and 17 intersection
 - Turning is not suitable for trucks at the intersection of Route 22A and Route 17
 - Poor sightlines at Route 17 and Hallock Road in New Haven
 - The roadway is already used by truck traffic from New York to Middlebury, VT as an alternative to VT-125
 - Where Route 17 crosses Otter Creek is too narrow, has many accidents, and is in poor condition
 - High wind conditions on Route 17
 - Sharing the road with slow-moving farm equipment could be an issue particularly during Addison County Fair and Field Days
 - The rural roads surrounding the Purple Route (like Green Street, Maple Street, Hallock Road) would be unable to bear the increased load of heavy truck traffic
 - The route would lengthen truck routes and possibly trip times, increasing fuel consumption, carbon emissions and increasing associated costs which may negatively impact the economy

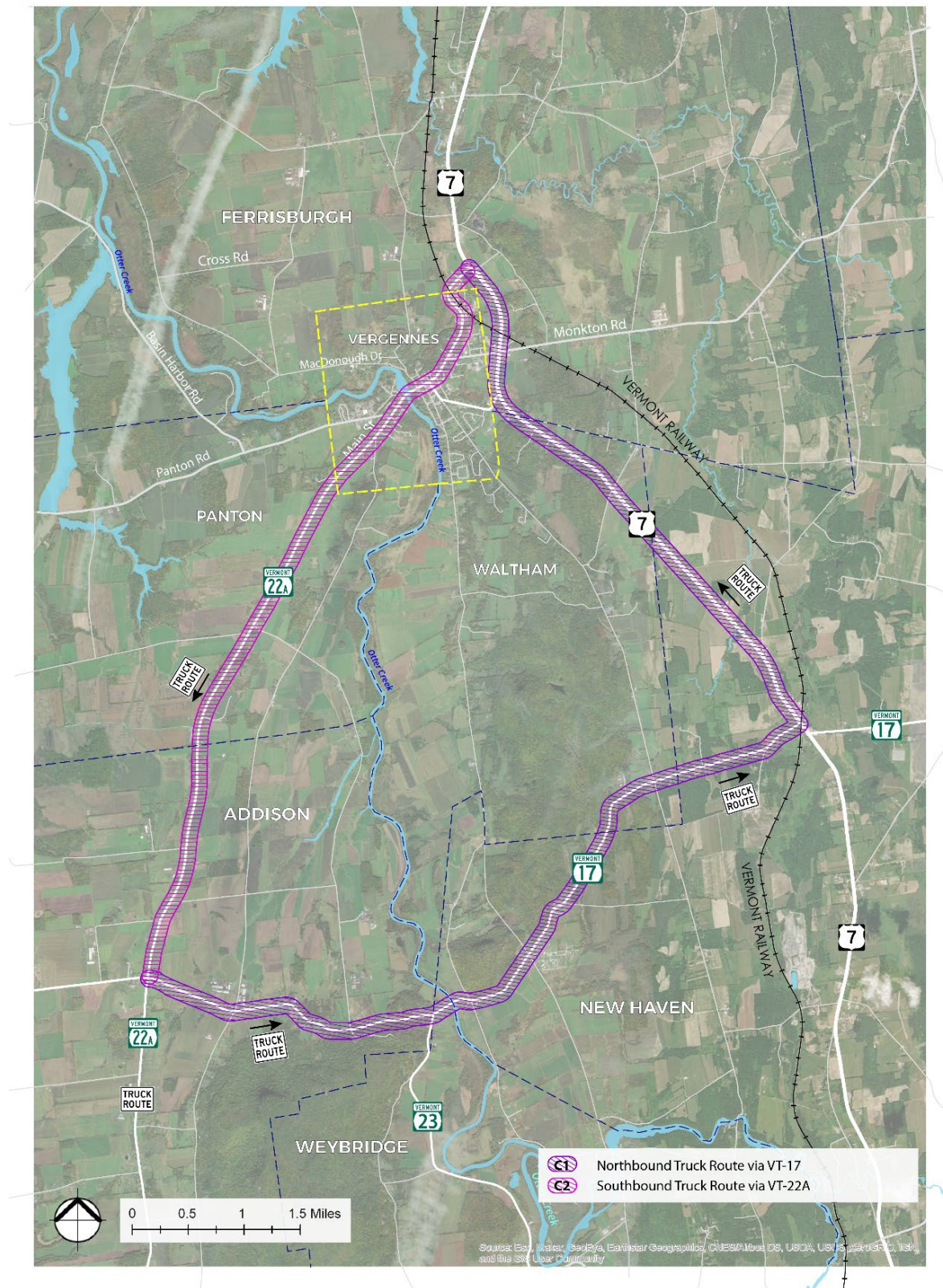
- Potential hazard of trailers returning empty compressed natural gas tankers to Ticonderoga's paper mill at the junction of Route 17 and Route 7
- It may negatively impact property values and business who did not anticipate Route 17 would become a regional truck route.
- Vergennes traffic problems should not become an Addison traffic problem

Theme 11. Question regarding the need for passing lanes with the Purple Route concept.

Response

The next phase of the study will consider the concepts at a greater level of detail, including conceptual engineering. Passing lanes may be considered to improve traffic operations due to limited sight distance and oncoming traffic volumes.

Figure 1-3 VT-17 NORTHBOUND/VT 22A SOUTHBOUND (PURPLE ROUTE)



2.3 PANTON-FERRISBURGH NEW ROADWAY CONCEPT (RED ROUTE)

The Panton-Ferrisburgh New Roadway Alternative (Figure 1-4) includes the construction of a new roadway in Panton and Ferrisburgh that connects Route 22A approximately one-mile south of the Vergennes-Panton municipal boundary with Route 7 in the vicinity of Little Chicago Road in Ferrisburgh. This concept would include a new crossing of Otter Creek and use a portion of existing roadways, including Walker Road and Little Chicago Road, each of which would require improvements to support additional traffic.

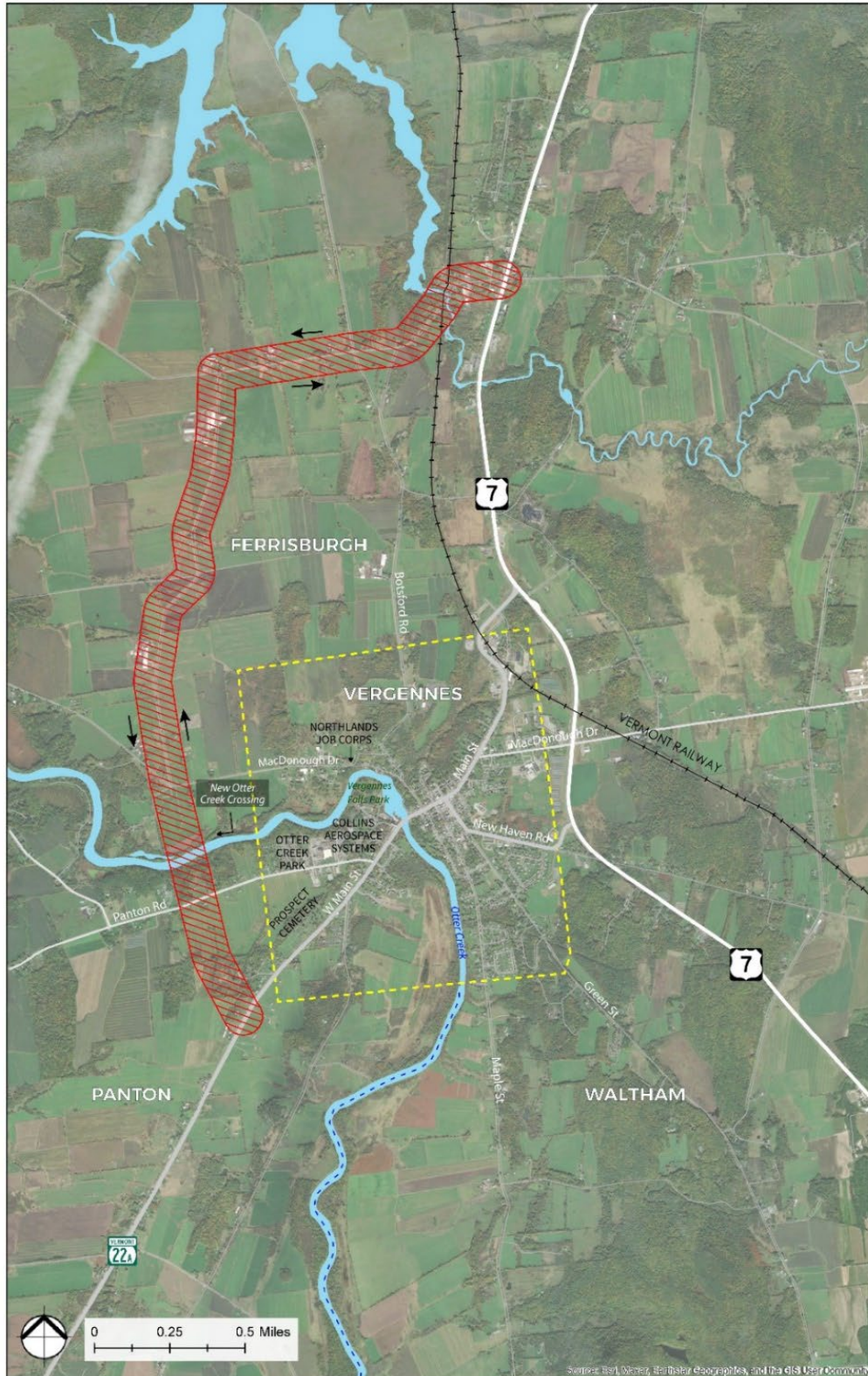
Theme 12. Commenters expressed concern/opposition to the Panton-Ferrisburgh New Roadway (Red Route). These concerns focused on environmental challenges including:

- Wetlands
- Rural areas
- Impacts to prime agricultural land
- Proximity to river
- Noise impacts to Basin Harbor Road

Other concerns related to this concept include:

- Does not allow for residential or economic development
- Conflicts with intentions to avoid displacing impacts to other communities
- Proximity to Ferrisburgh Elementary School

Figure 1-4 PANTON-FERRISBURGH NEW ROADWAY CONCEPT



2.4 PANTON-VERGENNES-WALTHAM NEW ROADWAY (GREEN ROUTE)

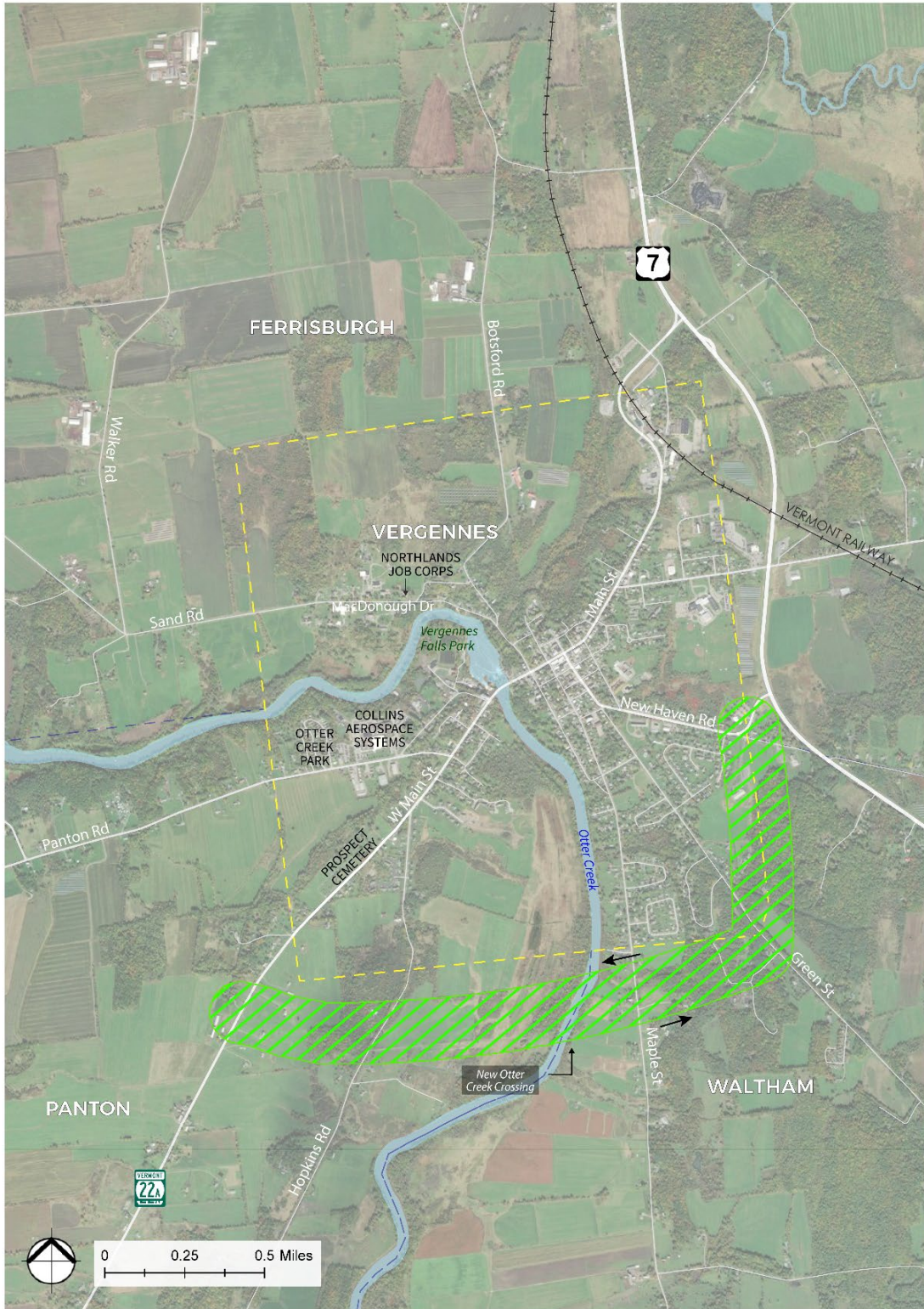
The Pantan-Vergennes-Waltham New Roadway (Figure 1-5) includes the construction of a new roadway primarily south and east of Vergennes within Pantan and Waltham. This concept would connect U.S. Route 7 in the vicinity of New Haven Road in Waltham or Ferrisburgh with Route 22A approximately one mile south of the Vergennes/Pantan municipal boundary. The road would intersect with several existing roadways, including Green Street and Maple Street in Waltham and Hopkins Road in Pantan. This concept would include a new crossing of Otter Creek at the Pantan/Waltham town line.

- Theme 13. Commenters expressed support for the Green Route. The comments noted various benefits such as:
- Provides a second Otter Creek Crossing
 - Crossing at this location (upstream of falls) would be easier to construct and possibly cheaper compared to crossings downstream of the falls.
- Theme 14. Commenters expressed concern for the Green Route (Southwest Route), these concerns included:
- The Route is too long
 - Location of new bridge crossing
 - Topographical challenges
 - Proximity to wetlands
 - Proximity to a K-6 school (Champlain Valley Christian School)
 - Impacts on residential areas
 - The route does not allow for commercial development when considering adjacent protected land and agricultural uses.
 - The route would not follow a smart growth approach.
 - The route would enter Route 7 at a dangerous point
- Theme 15. Residents questioned the dismissal of the Green Route and requested an explanation for removing this concept.

Response

During the initial screening, the Green Route resulted in a lower overall score. The reasons for the lower score included the Green Route is longer than the current existing routes, potential negative impacts to known wetland resources, and the conflict in land use as the area is primarily rural and agricultural, protected lands.

Figure 1-5 PANTON-VERGENNES-WALTHAM NEW ROADWAY (GREEN ROUTE)



2.5 DISMISSED CONCEPTS

Theme 16. A commenter asked why the study team did not suggest re-routing truck traffic on Route 17/Route 7 both southbound and northbound.






Response

Re-routing truck traffic on Vermont Route 17 and U.S. Route 7 both southbound and northbound was considered on the long list of alternatives as a possible solution to reduce the impact of large truck traffic on Route 22A and within Downtown Vergennes. This VT-17 Concept would restrict through truck trips on Vermont Route 22A in Vergennes, directing regional truck traffic to Vermont Route 17 and U.S. Route 7 (Route 7) between Ferrisburgh and Addison. Posted signage would direct trucks to this route: northbound at the intersection of Route 17 and Route 22A and southbound at the intersection of Route 7 and Route 22A. This would effectively remove all through truck trips within Downtown Vergennes through state legislative action. Such action would codify and enforce truck restrictions to disincentivize or prohibit truck traffic on Vermont Route 22A through Downtown Vergennes.

While the Route 17 Concept meets the Purpose Need, this concept did not score as highly, compared to the other concepts. Increased truck traffic would result in impacts to other communities, primarily in Ferrisburgh, New Haven, and Addison. In addition, this concept would result in an increase in trip time, due to the increased distance.

3. Screening Criteria

The needs identified in the Purpose and Need Statement informed the screening criteria for the long list of alternatives screening and include:

	Mobility and Access: Maintain opportunities for the movement of freight in the region and minimize and/or mitigate traffic impacts to other transportation corridors.
	Safety, Circulation, and Resilience: Support the continued movement, resilience, and safety of travel through downtown Vergennes and in the neighboring communities.
	Quality of Life: Improve the quality of life and minimize negative property and environmental resource impacts in downtown Vergennes and neighboring communities.
	Economic Vitality: Promote economic vitality of downtown Vergennes, goods movement in Vergennes and neighboring communities, and support rural economy.
	Land Use: Support local and regional land use plans and policies and state land use goals.

3.0 MOBILITY AND ACCESS

Mobility and access were considered in the screening process through the following criteria.

Maintains freight mobility throughout the region; concept does not significantly hinder or inhibit the movement of freight goods through the Addison County region and continues to support or improve freight operations in this critical economic corridor.

Improves access to destinations in downtown Vergennes for all modes of transportation: concept improves access to local destinations in Vergennes including businesses, amenities such as Vergennes Falls Park, essential services, recreational activities, and places of worship, for all modes with a local destination including motorized (bus, truck, car), non-motorized (biking, walking, rolling, etc.) and maritime (boating) modes of transportation.

Comments and questions related to mobility and Access are incorporated into the individual concept they apply to in Section 2. Alternative Concepts

3.1 SAFETY, CIRCULATION, AND RESILIENCE

Safety, circulation, and resilience were considered in the screening process through the following criteria.

Creates redundancies to improve resilience¹ of road network; concept will create new means of regional access that provide additional options for transportation between regional origins and destinations in

¹ The ability to prepare for changing conditions and withstand, respond to, and recover rapidly from disruptions.

Addison County, Vermont, and New York. In addition to redundancy, a new Otter Creek crossing supports resilience and climate change.

Improves motorized circulation through and within the region; concept will support motorized (personal vehicle, transit, freight, etc.) connectivity throughout the many regional corridors via local, state, and regional routes by considering improvements to roadway infrastructure, parking, and overall traffic reduction.

Improves active transportation (bicycle, pedestrian, transit) through and within the region; concept will support non-motorized (biking, walking) connectivity by implementing complete streets/streetscape improvements that will improve or expand upon existing infrastructure and improve/expand sidewalks and other pedestrian/bicycling amenities that will encourage non-motorized accessibility and safety. This may include, but is not limited to improved crossing infrastructure, sidewalk improvements, implementation or expansion of regional bicycle routes, safety improvements on regional routes, and connectivity to transit options.

Improves motorized and non-motorized safety on Vermont Route 22A through downtown Vergennes; improve the overall safety for all user types by minimizing conflict points at vehicle-vehicle or vehicle-pedestrian crash hot spots, and improved visibility along Route 22A within downtown Vergennes.

Theme 17. Commenters asked several questions related to truck data including the origin and destination of truck trips through traffic, whether trucks going through Vergennes are generally loaded or unloaded as they travel northbound and southbound.

Response

An initial analysis of the Origin and Destination of truck trips through downtown Vergennes was performed as part of the Purpose and Need Memo published in March 2022 (Section 4.2.1 Mobility and Access). The full memo is available online [here](#). Takeaways from the initial analysis include:

- Many of the origin-destination pairings show trips that frequently originate north of Vergennes and travel to destinations south or west of Vergennes
- Many fuel trucks travel Route 22A between New York State and Burlington.

Theme 18. A commenter suggested adding a traffic light at MacDonough Drive to make Route 22A less desirable for trucks and safer for drivers.

Theme 19. A commenter suggested that VTtrans prohibit trucks on Route 22A and make trucks find their own alternate routes.

Theme 20. Commenter shared that the Federal Motor Carrier Safety Administration (FMCSA), the federal agency responsible for regulating commercial motor vehicles database can give some insights on Origin/Destination data and truck inspection results.

Theme 21. Commenter suggested that the study team speak with Albany fuel dealers for more information on Origin/Destinations of trucks.

Theme 22. Commenter stated that trucks travel through Vermont because there are fewer DMV inspections, no tolls and lower fines if caught in DMV inspection.

Otter Creek Bridge and Crossing

- Theme 23. Commenters expressed support for a new Otter Creek Bridge.
- Theme 24. Commenters stated concern over the safety and lifespan of the current Otter Creek Bridge. A commenter asked if there had been a recent study on the lifespan of the bridge. Another commenter asked if there is a point in the study where we could recommend emergency relief action in response related to the Otter Creek Bridge Crossing – or that action could take place while the study continued.

Response

Bridge 27 on Route 22A over the Otter Creek in Vergennes is a City owned and maintained bridge. VTrans assists all municipalities with inspections of large bridges and last inspected bridge 27 in July 2022. The findings are available online at <https://vtransparency.vermont.gov/pages/bridges2>.

VTrans discussed their 2022 inspection findings with the City of Vergennes in summer/fall 2022 and made suggestions for temporary fixes until larger scale repairs, rehabilitation or replacement occurs. Next steps, both temporary and permanent, are the responsibility of the City who owns and maintains the bridge. Through the statewide prioritization process which occurred in Spring 2023, the bridge is anticipated to have some federal and state funds allocated to assist the town with a construction project, through the Town Highway Bridge Program. These funds are anticipated to be included in the FY24 Capital program (July 2023 - June 2024) for scoping to start. For further information about the bridge, please contact Ron Redmond (Vergennes City Manager, manager@vergennes.org 802-238-5598).

- Theme 25. Commenter expressed concern over the lack of netting upstream and the potential damage of the bridge structure from debris floating downstream.

3.2 QUALITY OF LIFE

Quality of life was considered in the screening process through three criteria.

Reduces truck noise, dust, and emissions in downtown Vergennes, concept results in an overall reduction in truck emissions as well as noise from air brakes, horns, diesel engines, and other sources of noise and vibration.

Avoids potential impacts to natural and water resources; concept minimizes or eliminates impacts to vulnerable environmental resources such as wetlands, forested areas, endangered species habitats, marine resources, and others.

Maintains and/or supports community character; concept does not significantly alter and/or supports the vision of impacted communities by maintaining overall character such as land use, infrastructure layout, and the overall context of the community.

- Theme 26. Commenters stated that if a bypass is built, Vergennes needs to address sewer issues in anticipation of any new housing that may be develop along the new roadway.
- Theme 27. Commenters stated that the future of the school system is an important issue, and Vergennes must retain critical mass to keep the district schools open. A commenter

emphasized that Vergennes is at the core of the community because five towns are part of one school district. Housing could be a good land use a new roadway if one is built.

3.2.0 Noise

Theme 28. Commenters expressed concern related to noise impacts, including:

- The need for an acoustic analysis
- Grade changes can have notable impacts on noise from braking.
- Noise from a new bridge is a concern.
- Existing noise on Main St
- Loud compression brakes can be heard on Route 22A south of Vergennes; could signage be posted to prohibit the use of compression brakes?

Response

Noise and vibration measurements were collected in November 2021 to document existing (baseline) noise and vibration levels affecting two receptor locations – the Vergennes Opera House and the Black Sheep Bistro. The result of this modeling is presented in the [Purpose and Need Memorandum](#) in Section 4.2.3. Potential changes in traffic noise will be estimated at a screening level based on the traffic forecast.

Theme 29. A commenter asked that VTrans budget high quality mitigation of noise, pollution, and visual resources. Specifically, tree buffering of Arborvitae, cedar, or evergreen trees in favor of built barriers such as concrete walls.

3.2.1 Equity

Equity, a pillar of Quality of Life was considered in the screening criteria and the following criteria were used to measure it in the screening process:

- Balances distribution of transportation resource benefits
- Avoids or minimizes impacts to surrounding communities, including disproportionate impacts to environmental justice communities

Theme 30. Commenters stated that the project should not displace the Vergennes traffic problem to neighboring communities (Addison, Panton, Ferrisburgh, New Haven, etc.). The solution should stay as close to the problem as possible to not add additional issues.

Response

Equity was considered during the initial screening through two screening criteria:

1. **Balances distribution of transportation resource benefits;** concept provides benefits to not only the downtown Vergennes community, but provides benefits to communities elsewhere in Vergennes, as well as surrounding/neighborhood communities.
2. **Avoids disproportionate burdens to surrounding communities, including historically disadvantaged and environmental justice communities;** any potential negative impacts posed by the concept are not disproportionately placed on neighborhoods or segments that are historically disadvantaged or are designated environmental justice communities based on income/poverty, English proficiency, or racial identity.

Additionally, potential impacts are not disproportionately placed on communities outside of Vergennes, while supporting improvements that only benefit Vergennes.

Theme 31. A commenter from the town of Panton stated that Panton does not support any new bridges or roads in their town.

3.3 ECONOMIC VITALITY

Economic Vitality was considered in the screening process through the following criteria.

Promotes economic vitality of Downtown Vergennes; concept will support economic activity in downtown Vergennes by supporting access to local businesses and maintaining non-freight traffic to the area, supporting downtown as a regional destination for commercial and tourist activity.

Supports regional economic vitality; concept will support economic activity in the Addison County region by supporting access to local businesses in Vergennes and other proximate municipalities, maintaining non-freight traffic to the area, supporting key economic corridors as regional destinations for commercial activity.

Theme 32. A commenter stated that development that supports a vibrant Vergennes would also be an economic catalyst for Waltham.

Theme 33. Commenter expressed concern that a new route could divert traffic away from Vergennes Main Street and negatively impact shops and restaurants.

Theme 34. Commenter asked what impact a bypass road would have on an existing Central Business District.

Response

The economic potential impacts will be considered during the next phase of the PEL study, as part of the land use visioning.

Theme 35. Commenter suggested that the project be paid for in part with a \$10 toll for trucks traveling in either direction.

Theme 36. Commenter asked how the bypass is going to affect the average taxpayer.

Response

At this stage the PEL Study is focusing on evaluating alternatives. In the next year, as the study begins conceptual design, VTrans will have a better idea of costs associated with potential alternatives and the implementation plan will explore some potential funding sources for whichever alternatives are likely to be pursued. After the PEL Study is complete, VTrans will be seeking funding before proceeding with next steps in environmental review.

3.4 LAND USE

Land Use was considered in the screening process through the following criteria.

Consistent with existing regional land uses; concept will not significantly alter existing land uses in the region, including but not limited to natural resource protection areas, farmland, residential communities, or economic centers.

Aligns with future and projected regional land uses and statewide goals; concept aligns with regional land use development plans for Addison County and the surrounding region based on municipal, regional, and statewide long-term planning documents.

Theme 37. Commenters suggested that a new roadway may catalyze residential development with the construction of this new roadway. (Comments referring to a specific concept are shown in Section 2. Alternative Concepts)

Theme 38. Commenter expressed support for “right sized” development close to a new sewer plant. Additionally, commenter noted recent vote for Vergennes to expand their sewer system.

Theme 39. Commenter stated that Ferrisburgh wants to preserve a critical mass of agricultural lands.

Theme 40. Commenters asked for clarification on land ownership/type in the areas where new roads are proposed. Specific questions included, how much eminent domain property was going to have to be taken, and how many people are going to be displaced. These comments raised concern about the following areas:

- Residential areas in Vergennes South of the Otter Creek Bridge

Response

Additional information on the potential types and number of properties that may be impacted by the proposed new roadways will be considered in the next phase of the study.

Theme 41. Commenters mentioned possible displacement of the Otter Creek Mobile Home Park.

Response

The PEL Study will continue to develop concepts that will minimize impacts to private property, including underserved and disadvantaged communities. No alternative currently being proposed for further study are anticipated to displace the Otter Creek Mobile Home Park.

Theme 42. Commenter raised the issue of conflict of interest between landowners with vested interest in real estate in the areas near the Red and Green Routes.

Theme 43. Commenter stated changes to the transportation network and potential development could affect voting about the future of the school system. The community wants to keep a high school in Vergennes and maintain a critical mass to keep the district schools open.

4. General

Theme 44. Commenters stated a concern over the amount of time it would take to build a bypass route and emphasized a need for a prompt solution to address and mitigate the current traffic issues.

Response

The Planning and Environment Linkages Study (PEL Study) builds off previous planning efforts completed over the last twenty-five years that considered alternatives at different levels of detail. The Study includes robust public engagement and will improve the efficiency of the federal environmental permitting process by identifying a short list of alternatives and through the early identification of significant environmental impacts. Another important component of the Study is to come to consensus on which alternative to pursue, considering the opinions of all 7 communities, their residents and others who may be affected by the alternatives. The ultimate purpose of the PEL Study is to identify outcomes that best serve the community's transportation needs and to improve project delivery timeframes.

Theme 45. Comments stated that truck traffic on Route 22 is illegal.

Response

Truck traffic on Route 22A in Vergennes is not illegal.

Theme 46. Commenters stated that Route 22A was not built for heavy truck traffic and should not have been designated as a truck route. They asked the agency to consider changing that designation, and let the trucks find their own route.

Response

Historically Route 22A was shown on the Vermont Truck Network (as designated in 2000) which provided a preferred highway routing for goods through the State, as related to vehicle length. Route 22A was not part of the national network which had no length limit, but instead part of the state truck network where no permits were required for trucks less than 72 feet. For those state highways not part of the national or state network, most required a permit for all trucks over 68 feet. The Vermont Truck Network did not allow any additional weight and did not necessarily result in more truck traffic than other state highways.

In 2009, the Truck Network was rescinded, and the legislature created a 75ft length limit statewide and the Truck Network Map evolved into the Truck Route Map (23 V.S.A. § 1432). The 2017 Vermont Truck Route Map shows Route 22A as one of the preferred truck routes, alongside U.S. Route 7, U.S. Route 4 and other major highways. A map is available online at https://vtransmaps.vermont.gov/Maps/Publications/Maps/Truck_Routes_2022.pdf

Another way to classify roads is the "National Highway System". It provides an interconnected system of major routes which serve major population centers, transportation facilities and other major travel destinations. U.S. Route 7, U.S. Route 4 and other major highways in Vermont are included in the National Highway System, but Route 22A is not. A map is available online at <https://vtrans.vermont.gov/planning/maps/maps>

Theme 48. Commenters asked if there were standards for roadways/truck routes and asked if the proposed alignment would meet standards.

Response

When designing a paving, roadway or bridge project, VTrans staff and consultants follow the Vermont State Standards which includes specifications according to traffic levels and other factors. If VTrans anticipates more trucks on the roadway, VTrans would alter pavement design for the anticipated loads. Over time, as VTrans does construction projects across the state they are looking to make improvements, where possible, including wider shoulders and other geometry changes.

4.0.0 Enforcement

Theme 49. Commenters raised concern over truck route enforcement related to monitoring of the weight of trucks, including:

- questioning the location of weigh stations
- stating that trucks avoid being weighed by going through 22A
- suggesting setting up a weigh station on 22A or cameras to count how many trucks are avoiding the weigh station

Response

Truck loads are regularly enforced, overweight permits are enforced by Addison County Sheriff's Department. Throughout Vermont, trained officers inspect commercial vehicles and their drivers for compliance with state and federal motor carrier safety regulations. Inspections are conducted at interstate weigh stations and along many of the state's frequently traveled rural roadways)².

Theme 50. Commenter suggested making Route 22A accessible by permit only so then trucks would have to use Routes 7 and 4.

Theme 51. Commenter stated a need for an enforcement zone on Route 22A south of Vergennes to monitor speeding trucks.

4.0.1 Public Outreach

Theme 52. Commenters asked for more details on the next steps of the PEL study.

Response

The PEL Study is currently in the concept screening process. Throughout 2023, the study team will work on Concept Refinement, Integrated Transportation & Land Use Alternatives, then Alternatives Evaluation & Recommendations. In 2024, the team will develop the implementation plan and publish the PEL report.

Theme 53. Commenters asked what the timeline for building any of these concepts would look like.

Response

There is not a timeline for construction at this time. The Vergennes PEL Study will evaluate transportation alternatives that reduce the impact of large truck traffic on VT Route 22A and Downtown Vergennes, while seeking ways to enhance the quality of life and economic vitality for residents in the City and surrounding towns. The PEL study will conclude in 2024. At that

² Transportation Facilities of the state of Vermont, 2018, https://vtransmaps.vermont.gov/Maps/Publications/Maps/EOC_2018.pdf

time, one or more alternatives may move into preliminary design and environmental review, once funding is identified. At that time, a construction estimate would be determined.

- Theme 54. Commenters expressed interest in receiving study updates regarding the Vergennes PEL Study. Comments included requesting:
- Sending emails
 - How to participate in meetings
 - Contact information to provide input
 - Recording of the Public meetings

Response

This study hosts a website that contains meeting recordings, study documents, concept illustrations, and upcoming meeting information [Home | Vergennes PEL Study](#). Through the 'Contact Us' section of the website the public is able to share input as well as sign up for PEL Study communication. [Contact Us | Vergennes PEL Study](#). Additionally, the public can directly email vergennesspel@gmail.com.

- Theme 55. Commenter asked if the study team could provide the scoring results for the long list of options.

Response

The scoring results will be published on the Vergennes PEL study website.

- Theme 56. A commenter requested the 2021 Average Annual Daily Traffic Volume data that was shown in the Purpose and Need Technical Memo.

Response

The Purpose and Need Technical Memo includes Route 22A Average Annual Daily Traffic (AADT) volume data from 2011 to 2021 in Figure 4-2 in Section, 4.2.1 Mobility and Access. Note that the baseline year used for traffic volumes is 2019 to account for pre-pandemic volumes which illustrate AADT volumes over 10,0000.

- Theme 57. Commenters provided input on the format of the meeting, including:
- Asking speakers to speak louder
 - Difficulty voting on concepts when the maps of the routes are not displayed
 - Discrepancy with naming conventions of routes
 - In-person participation was challenging without having a cell phone at the event

Response

The study team appreciates the feedback on the meeting format and will seek to minimize the issues brought to our attention during future engagement by adjusting the format of meetings and activities for greater clarity.

- Theme 58. Commenters sought clarification on details shown in the map, specifically they mention topographical elements, schools, and wetlands.

Response

The study team is revising figures to clarify the interaction between potential routes and existing natural and built features in the area in secondary screening. Updated maps, based on this secondary screening, will be available on the study website once completed.

Theme 59. Commenter emphasized that Panton needs to be at the table for decision making and was concerned that Panton is not adequately represented at the Policy Committee meeting.

Response

The Policy Committee includes representation from the City of Vergennes and the surrounding towns, including the Town of Panton. Members of the Policy Committee are listed on the study website: <https://vergennesspel.com/committees/>.

Theme 60. Commenters noted other stakeholders that should be engaged, including residents of Vergennes that live on Main Street and the Vergennes school district.

Theme 61. Commenter suggested that the Morrisville Alternative Truck Route be used as a best practice.