

TO: Addison County Regional Planning Commission
FROM: Vermont Department of Housing & Community Development
DATE: March 12, 2026
RE: Addison County Regional Planning Commission Regional Plan Pre-Application
SUBJECT: FORMAL REVIEW AND COMMENT BY DHCD

Overview

- This memo provides formal review and comment by the Department of Housing & Community Development (DHCD) on the proposed regional plan referenced above.
- The primary objective of this Memo is to address potential issues prior to RPC hearings, support review and comment by the CIB, and support a positive determination of compliance by the LURB.
- The LURB is ultimately responsible for holding hearings and determining compliance with a regionally adopted plan (24 VSA §4348).

Process

- The **Addison County Regional Planning Commission (ACRPC)** submitted a pre-application to LURB on **January 26, 2026**.
- The LURB provided notice to partner agencies on **January 28, 2026**, with [submitted materials](#).
- To establish the new community investment designated downtown centers and village centers and neighborhoods, the LURB must ensure future land use areas (FLUA) proposed for designation meet the requirements under 24 V.S.A. § 5803 and 5804 for designation as downtown and VCs and neighborhood areas (10 VSA §6033).
- A positive determination of compliance by the LURB transfers all legacy State designated areas (Downtown Centers, Village Centers, New Town Center, Growth Centers, and Neighborhood Development Areas) and establishes eligibility for the new [State Community Investment Designations](#) and Act 250 Tier 1B and Tier 1A jurisdiction.
- Upon determination of compliance of the regional plan by the LURB, future land use areas (FLUA) that establish designation will be recognized as Community Investment Program designated downtown/village centers and neighborhoods and tracked in the State's Planning Atlas and Data Center.
- Proposed regional plans will now apply a [standard methodology for FLUA](#) mapping developed by VAPDA and the [Enterprise GIS Consortium](#) has adopted a regional plan FLUA data standard to support statewide-consistent map data. Both implement the land use categories established by statute: *downtown centers (DC), village center (VC), planned growth area (PGA), village area (VA), transition area, enterprise area, resource-based recreation area, hamlets, rural general, rural ag/forestry, and rural conservation* (24 VSA §4348a).
- The LURB developed a [Mapviewer](#) to assist in its partner agency reviews of the preapplication FLUA map.
- The Department's review and comments are primarily limited and focused on FLUAs establishing a Community Investment Designation and region-wide mapping topics or issues. The Department did not review the remainder of the plan.

- The designated downtown/village centers have three “steps” for (beginner [1], intermediate [2], advanced [3]) with graduated requirements and benefits. All *DCs and VCs* mapped by the RPCs enter the Community Investment Program. Centers associated with a legacy designated downtown enter the program at Step 3. Centers associated with a legacy designated new town center or village center enter the program at Step 2. All other centers, including all newly mapped centers with no legacy designation associated with it, enter the program at Step 1. Municipalities may then apply to submit an administrative application to the Department to advance to Step 2 and 3 (24 VSA §5803). The step data developed will support updates to the [Vermont Planning Atlas](#) and [Data Center](#) upon LURB determinations of compliance.

Municipalities & FLUAs Proposed for Designation

Summary on FLUAs proposed as Centers & Neighborhoods

Designated Areas Proposed	49	
Total New	32	65%
Total Legacy	17	35%
Centers	23	47%
Step 1 Centers Proposed	9	39%
Step 2 Center Proposed	11	48%
Step 3 Centers Proposed	3	13%
<i>Legacy Centers</i>	15	
<i>New Center</i>	8	
Neighborhoods	26	53%
Planned Growth Area Neighborhoods	6	23%
Village Area Neighborhoods	20	77%
<i>Legacy Neighborhoods</i>	2	
<i>New Neighborhoods</i>	24	

Commentary

The Department of Housing & Community Development's (DHCD) most heavily weighted consideration in evaluating the Future Land Use maps is whether a region has included sufficient area in Centers and Neighborhoods to safely enable the region to achieve its [statewide and regional housing targets](#), established as part of Act 181 (24 V.S.A. § 4348a(a)(9)). ACRPC has conducted robust engagement with its communities and municipal leadership to identify the centers and neighborhoods where growth is most desired.

Statute (24 V.S.A. § 4302(c)(1)(A)) requires that a substantial majority of the units be encouraged in downtown centers, village centers, planned growth areas, and village areas. The upper targets for the ACRPC region as established in the statewide and regional housing targets are 1,978 during the period of 2025-2030, and 8,088 during the period of 2025-2050, indicating average annual unit creation in the County of 395 per year to achieve the 2030 target or 324 per year to achieve the 2050 target.

According to the [DHCD Housing Development Dashboard](#), Addison County's current pace of 124 units per year puts them County far behind the pace for their upper 2030 housing targets. Addison County is on pace to build 548 units during the 2025-2030 period according to the dashboard. According to building permit data obtained from the US Census Bureau and as reported on [HousingData.org](#), between 2008 and 2024, Addison only permitted an average of 108 units per year.

While this is a review and comment of the Regional Plan, and thus indirectly the underlying municipal plan, it does not provide direct comment on local zoning and bylaws. The Department encourages ACRPC and municipalities to ensure that zoning and bylaws account for and accommodate the growth needed to achieve the statewide and regional housing targets and to enable the growth sought by this Regional Plan.

Region-wide Mapping Topics

Expired Municipal Plans

The following towns have expired plans, disqualifying them from neighborhood designation: Shoreham, Addison, Goshen, Bridport, Ferrisburgh, Middlebury, Leicester, Lincoln (does not affect a neighborhood), Whiting (does not affect a neighborhood). Several of the towns that currently do not qualify could qualify if they had valid plans. To qualify for a neighborhood, the communities must maintain an approved and regionally confirmed planning process.

Treatment of Centers

Centers must have a mix of uses, economic activity, civic assets, be the traditional/historic/central business and civic center, be listed or eligible for an historic district, and be contiguous and connected. DHCD noted areas that may not contain all of those elements or contain undeveloped land or predominantly residential areas; however, broader regional community and planning context may help explain ACRPC centers mapping. In some cases, these areas may be more appropriately mapped as another FLUA, which may include FLUAs that qualify designated neighborhoods.

Flood Hazard (FH) Mapping

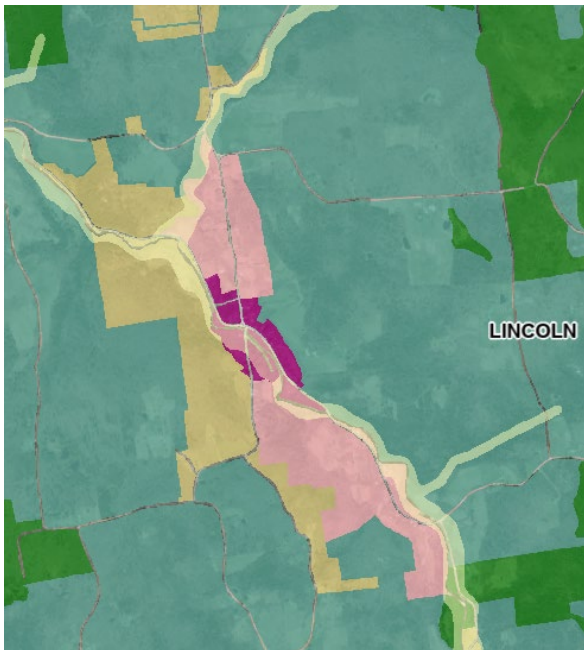
The region appears to have no, or limited, digitized flood hazard (FH) mapping in the map viewer. DHCD wondered if any digital FH mapping is available in ACRPC.

Flood Hazard (FH) & River Corridor (RC) Areas in Proposed Neighborhoods

It does not appear that Flood Hazard (FH) areas are digitized throughout the entire region, while River Corridors have been.

FH areas that are undeveloped may not be appropriate for PGA and VA neighborhoods.

Below is an image of Lincoln with River corridor overlaying the village area into undeveloped lands, an example that occurs throughout the region.



Expansion of a downtown/village center into FH and RC may be appropriate where there are buildings that would benefit from tax credits or other flood resilience investments. Expansions of centers into undeveloped RC and FH are better mapped as another FLUA to minimize hazard risk.

Public Water/Wastewater Mapping

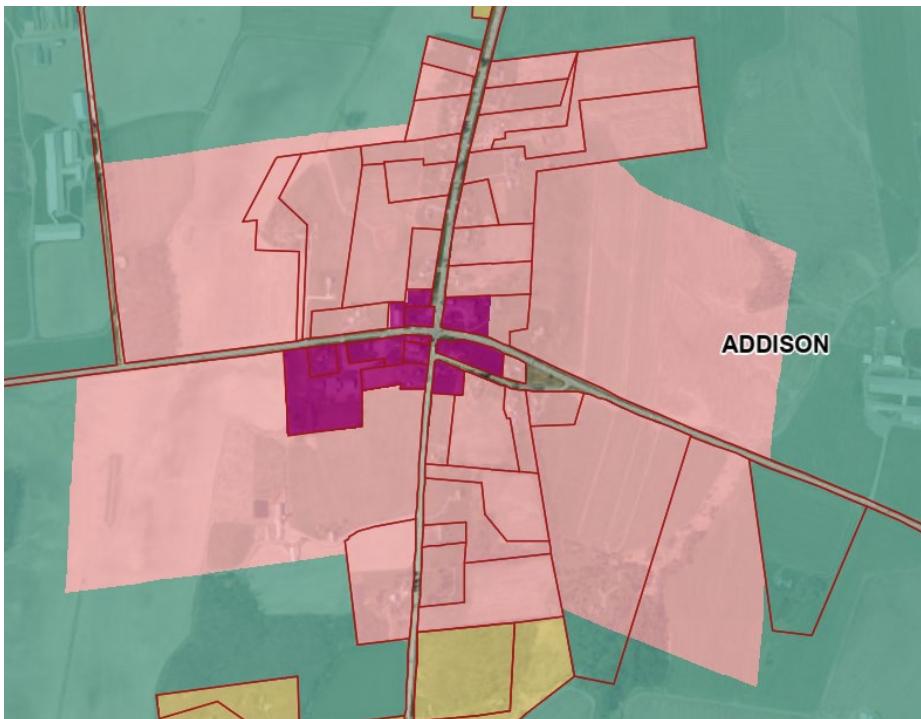
DHCD noted that water and wastewater mapping is largely absent in the region, even where wastewater treatment plants appear on the map. Neighborhoods have water/wastewater requirements that DHCD was unable to evaluate.

FLUAs Bisecting Buildings and Parcels

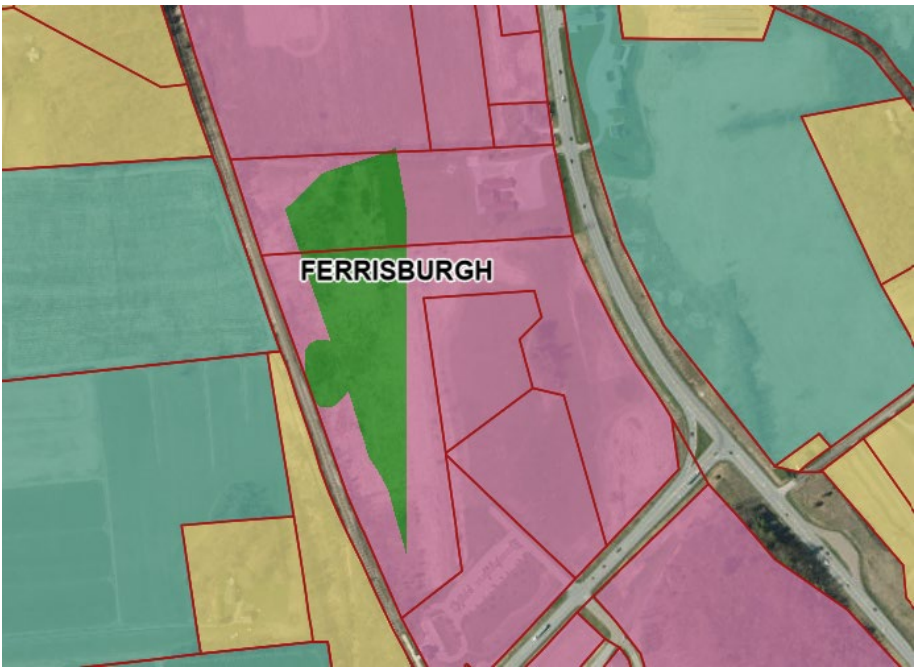
There are instances where FLUAs bisect buildings and parcels, which could make application of regulatory jurisdiction and future investment targeting complicated.



In some cases, it may make sense to bisect large parcels, but in the Addison example below (or in a similar example in New Haven), the village area lines do not align with similar parcel line bearings and would appear to establish a competing development objective if the large farm parcels are agriculturally important lands and/or subject to current use/conservation.



Example of irregular conservation FLUA surrounded by Planned Growth Area within parcels.



Right-of-Way Mapping

The regional maps do not include ROWs in the FLUAs. VAPDA and the LURB has issued guidance on how to map the FLUA for ROWs.

Dense Development for Proposed Planned Growth Area Neighborhoods

While this is a review and comment of the Regional Plan, and thus indirectly the underlying municipal plan, it does not provide direct comment on local zoning and bylaws. The Department encourages ACRPC and municipalities to ensure that zoning and bylaws account for and accommodate the growth needed to achieve the statewide and regional housing targets and to enable the growth sought by this Regional Plan. PGA Neighborhoods must be planned for high density residential and mixed-used development. The regional maps are intended to roll-up and recognize municipal work to establish the condition for smart growth and development consistent with the State’s enacted goals. Areas within a proposed neighborhood, like in Bristol or Vergennes, where the municipality does not allow high-density residential and *mixed-use* development should be rezoned by the municipality to those uses, otherwise, they may be more appropriately mapped as another FLUA.

Walkability & Transportation

While walkability is not defined by statute, the Region may want to consider if a proposed neighborhood/PGA/VA is generally a walkable distance from a center, or has capital plans to provide for multi-modal transportation, complete streets, or transportation choice. Planned transportation infrastructure includes those investments included in the municipality’s capital improvement program pursuant to section 4430 of this title (24 VSA §4348a(12)(B)). The Vermont Planning Data Center contains records on municipal planning and plan implementation, including if the municipality has a

capital program. The Vermont Planning Data Center is updated annually (at a minimum) by the Region on behalf of its member municipalities.

Village Area Suitable Soils

Village areas must have public water or wastewater or suitable septic soils. As noted above, the status of water and wastewater mapping is absent across much of the region, making it difficult to know where suitable soils may need to be relied on. DHCD recommends close analysis of soil suitability if in fact public water/wastewater does not exist in planned or proposed village areas.