



**From:** [Jak Tiano](#)  
**To:** [Act250 - Board](#)  
**Cc:** [Miro Weinberger](#); [Jordan Redell](#)  
**Subject:** Let's Build Homes - Comments on CCRPC FLU/Tier 1B Pre-application  
**Date:** Monday, December 1, 2025 10:34:03 PM  
**Attachments:** [2025-12-01\\_LBH\\_LURB\\_CCRPC\\_Tier1B\\_Pre-Application-Comments.pdf](#)

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Hello,

On behalf of Let's Build Homes, I'm sending along our comments on the CCRPC's FLU/Tier 1B pre-application materials.

Comments are attached as PDF.

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To: Land Use Review Board  
10 Baldwin Street  
Montpelier, VT 05633-3201  
From: Jak Tiano, Let's Build Homes Policy Director  
Miro Weinberger, Let's Build Homes Executive Chair  
Date: December 1st, 2025

## RE: CCRPC Tier 1B Pre-application and Future Land Use Maps Submission

To the Members of the Board,

On behalf of Let's Build Homes, we are writing to offer comments on the Future Land Use Map and Tier 1B pre-application submitted by the Chittenden County Regional Planning Commission (CCRPC). We have been engaged with the CCRPC throughout this process, having submitted detailed comments on their draft maps to them in June 2025.

We recognize that this is a complex, high-stakes effort, and we continue to appreciate the thoughtful and transparent approach the CCRPC has taken. In general, the maps presented in this pre-application appear logical and future-oriented. However, as this process moves toward finalization, we wish to highlight specific opportunities to strengthen the maps to ensure they fully meet the scale of the region's acute housing shortage.

### Comments on Specific Map Designations

While the maps are largely successful, we believe minor adjustments could improve them to ensure the logic of the growth areas is consistent and unfragmented.

- **Eliminating "Holes" in Growth Areas:** In our review, we identified instances—specifically within South Burlington—where land designated as *Rural General* appears as islands surrounded by, or immediately adjacent to, areas designated as *Planned for Growth*. We believe a guiding principle for the Board should be "no holes in growth areas", barring valid conservation purposes. If land is enveloped by planned growth areas, designating it as rural fragments the development landscape and undermines the utility of the map.

## Regional Capacity and Participation

Beyond the specific lines on the map, we have broader observations regarding the region's capacity to meet its housing targets based on the current level of municipal participation and the specific housing typologies required in Chittenden County.

- **Municipal Participation:** We are concerned that approximately one-third of eligible communities are not expected to opt into Tier 1B status at this time. We are particularly troubled by the absence of Colchester and Essex, which represent 18% of the county's population and sit contiguous to the growth centers of Winooski and Essex Junction. This creates a fragmented map that fails to fully reflect the reality of the regional housing market, raising concerns about whether Act 181 in its current form will have the positive impact on housing costs and the housing shortage that the legislature intended. We urge the LURB to remain open and responsive to future Tier 1B additions should these municipalities reconsider.
- **Housing Scale and Transit Oriented Development:** While the mapped *Planned Growth Areas* likely contain sufficient acreage to meet the raw housing targets, we are mindful that Chittenden County, as Vermont's most urban area, has a unique need for larger-scale, multi-family development (designated as 20+ unit projects in the ECOS plan). It is our observation that reaching the necessary scale for these specific housing types will likely rely heavily on Transit Oriented Development.

Because of this, the ultimate success of the region's housing strategy may depend heavily on the forthcoming Tier 1A process, where the incentives for such density are strongest. We urge the Board and the RPC to remain vigilant in ensuring that the final "regulatory container" allows for the specific *types* of high-density homes the county needs, which are best facilitated through deep integration with transit corridors.

## Conclusion

We view the CCRPC's application materials as a strong foundation. By addressing the logical gaps in specific growth areas and keeping a sharp focus on the regional necessity for transit-oriented density, we believe this framework can successfully support the abundant, well-located housing Vermont needs.