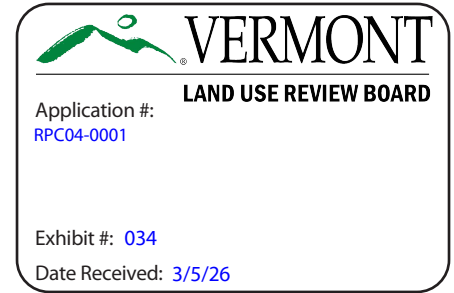


## MEMORANDUM

To: Sarah Hadd, Land Use Review Board  
From: Taylor Newton, Planning Program Director  
Date: March 5, 2026  
Re: Preapplication Review Questions – Supplemental Information



Our staff greatly appreciates the guidance provided by the Land Use Review Board (LURB) at our meeting on Monday, March 2, 2026. Our staff is feeling more confident about how we can work with our municipalities to finalize future land use (FLU) map edits.

At the meeting, CCRPC and the LURB reviewed supplemental information submitted by CCRPC to support mapping the Williston Road area (east of Kennedy Drive) in South Burlington as Planned Growth Area (PGA). This included discussing the City Plan, regulations, infrastructure, and employment in the City. It also included a discussion about the statutory description of PGA and the conformance with this area with PGA criterion (v) (see [24 V.S.A. §4348a\(a\)\(12\)\(B\)](#)). Specifically:

- Does this area constitute “high-density existing settlement and future growth areas with high concentrations of population, housing, and employment in each region and town, as appropriate?”
- Does this area meet the following criterion: “The municipal plan indicates that this area is intended for higher-density residential and mixed-use development.”

CCRPC has taken an expansive view of PGAs. Within the broader context of the City of South Burlington’s PGA, there is a high concentration of population, housing, and employment, even if the specific subject area along Williston Road and Kimball Avenue are in the City’s Commercial-Industrial, or Commercial/Industrial with Supporting Uses future land use areas, and housing is not planned for this area. However, nearby housing is walkable and directly connected to the subject area via bike/ped infrastructure and public transit, and there are a high concentration of jobs.

LURB members recommended on March 2, 2026 that CCRPC staff work with the City of South Burlington to provide more “granular” information to the LURB about the area to potentially differentiate between those areas meeting PGA criteria and those areas that are more appropriate as Enterprise Areas. It has proven difficult. Dividing this area into part PGA and part Enterprise is not an accurate reflection of municipal planning and regulation.

CCRPC has worked with City of South Burlington to develop two concepts for consideration:

- **Scenario 1 – Planned Growth Area (PGA)** – The area would remain PGA as submitted to the LURB during pre-application. This approach only works if the area can be approved by the LURB upon final application.
- **Scenario 2 – Enterprise Area with PGA Islands** – The area would be mapped as Enterprise Area except for two places where the City is planning for Low-Scale Residential along Milham Court and Shunpike Road. These areas would remain PGA to reflect municipal planning, infrastructure access, and walk/bike connectivity.

CCRPC and the City also considered mapping the entire area Enterprise, but this did not seem appropriate given that the City has, and is planning to maintain, two residential neighborhoods in this area.

**Other Considerations:**

- **Accommodations** – South Burlington now allows temporary accommodations (think extended stay hotel) in the Commercial-Industrial Zoning District (which is most of the subject area), up to 60 guest rooms, as an accessory use to General Commercial, Large Use in a structure 50,000 SF GFA or greater (see [“Accommodations” on page 309 and the table of uses on page 315](#)) . Our understanding is that hotel rooms are treated as housing per Act 250 rules (see [definition of “dwelling” on page 8](#)) and past Act 250 decisions (see [Brattleboro Chalet Motor Lodge, Inc., #4C0481-2-EB \(10/17/84\)](#)).
- **Tier 1A** – The City is interested in applying for Tier 1A in the future. If the subject area is mapped as PGA then it is eligible for Tier 1A. Maintaining eligibility is, from CCRPC’s perspective, a positive given anticipated growth in this area over the next 50 years.

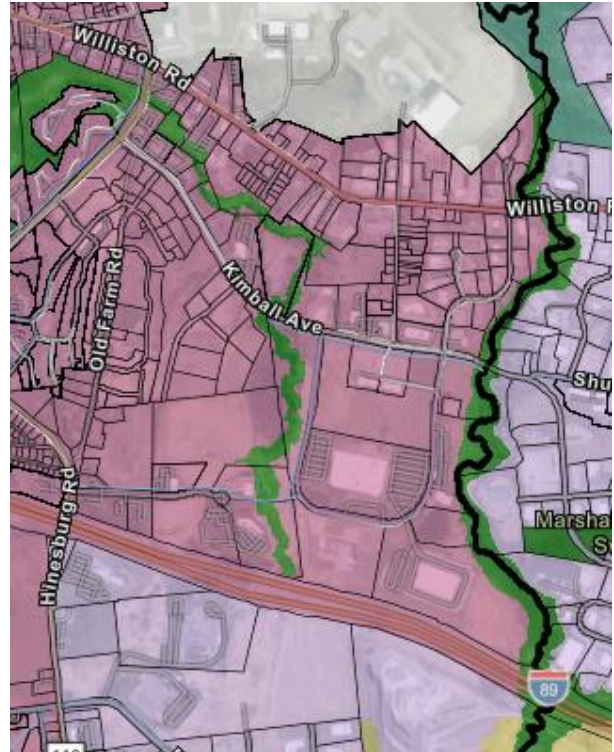


Figure 1 - Scenario 1

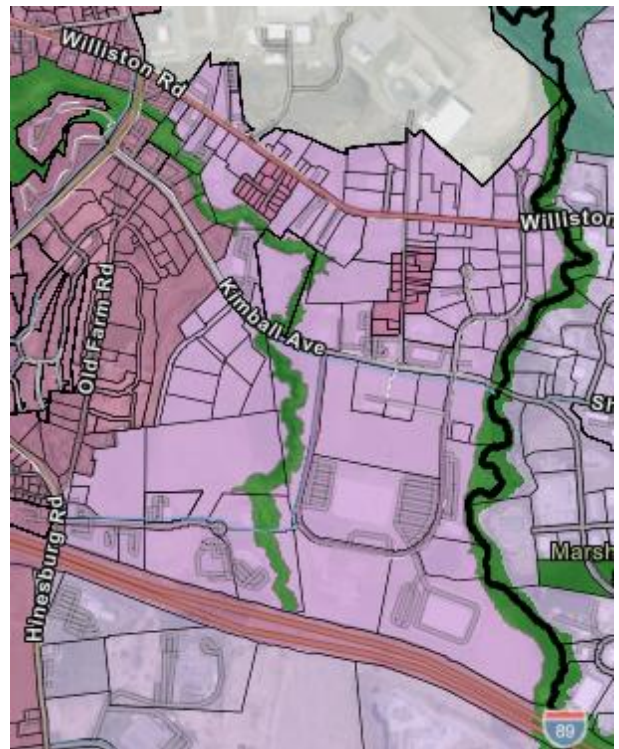


Figure 2 - Scenario 2

CCRPC staff looks forward to meeting with the LURB on Monday, March 9<sup>th</sup> to continue our discussion about this important part of our region. Specifically, we would like to understand if the LURB would be okay with Scenario 1 (our preference) or will require us to move to Scenario 2?

**Information from CCRPC’s February 24, 2026 Memo:**

**South Burlington – Planned Growth Area – Williston Road/Kennedy Drive Eastern Area:**

CCRPC submits the following supplemental information:

a. **City Plan** - The [City Plan’s](#) future land use map uses several different land use categories in this geographic area (see p. 113). There is a node of “Balanced Mixed Residential and Commercial High Scale” at Kennedy and Kimball Ave. The areas to the east are a mix of “Commercial-Industrial,” “Commercial/Industrial with Supporting Uses,” “Principally Conservation & Open Space,” and “Principally Residential, Lower Scale.”

b. **South Burlington Development Regulations** – Most of the land along the Williston Road corridor east of Kennedy Drive is in the Mixed Industrial & Commercial Zoning District. There are also two areas of Low-Scale Neighborhood Zoning District within the corridor where there are existing residential uses.

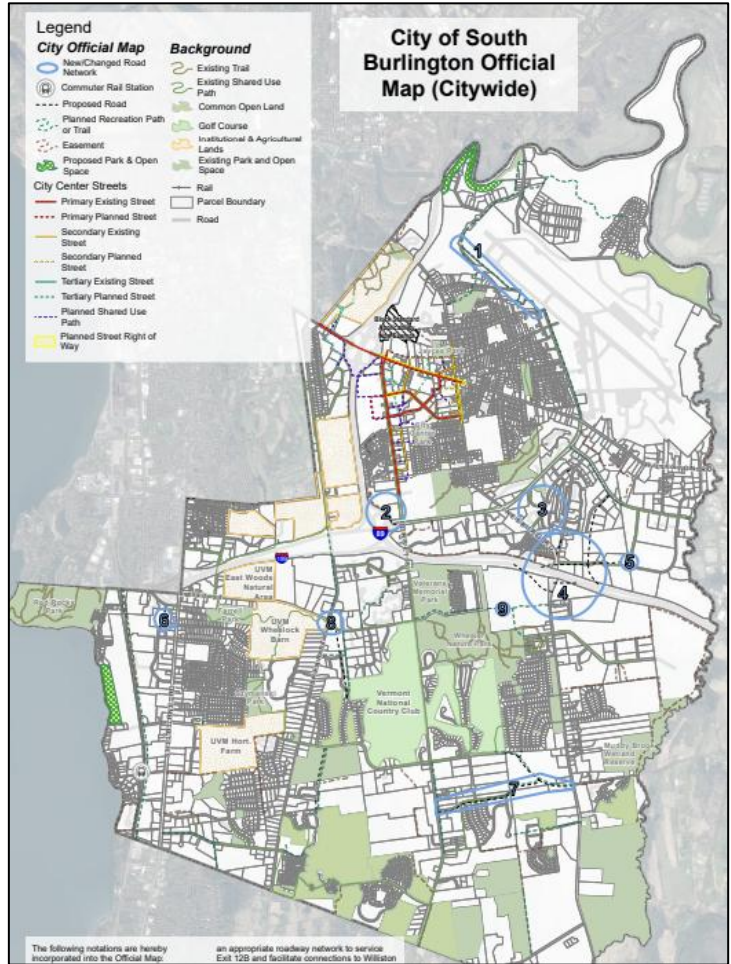


Figure 3 - South Burlington Official Map

i. The purpose of the Mixed Industrial & Commercial Zoning District is as follows:

*The Mixed Industrial-Commercial (IC) District encourages general industrial and commercial activity served by major arterial roadways and Leahy Burlington International Airport. The Mixed Industrial-Commercial district encourages development of a wide range of commercial, industrial, and office uses compatible with the City’s economic development policies in locations compatible with industrial activity. Major retail uses, such as supermarkets and shopping centers shall not be permitted.*

The purpose of the Low-Scale Neighborhood Zoning District is as follows:

*Low-Scale Neighborhood (LSN) District encourages primarily residential use in smaller building types (single-family, duplex, and small-multifamily homes) within existing neighborhoods and on underdeveloped land in or adjacent to those neighborhoods. Specified commercial and other nonresidential uses are encouraged within the district in locations that have direct access to arterial and collector streets and with siting and design standards to ensure compatibility with residential properties to support the future thriving of walkable and bikeable neighborhood. Thoughtful public spaces oriented to neighborhood use well connected to the neighborhood are also a high priority.*

Note that despite being called a “Low-Scale Neighborhood,” the district’s minimum lot size is 7,000 square feet. Each lot can accommodate up to four units per acre due to the required provisions in [24 V.S.A. 4412](#) (this area is served by municipal water and sewer). This means that there could be a residential density of up to 20 units per acre in this zoning district. That is a relatively high density of residential development within the Vermont context.

- ii. **Site Plan Review** - All land uses in South Burlington (except single unit to four unit dwellings) are subject to site plan review (see Article 14 – p. 208 – 221). Site plan review standards include:
  - 1. Buildings must be oriented to the street.
  - 2. Parking shall be on the side or rear of buildings.
  - 3. There must be direct pedestrian access to the front of the building from the sidewalk.
- iii. **Transit Overlay District** – The entire Williston Road Corridor, Technology Park, and surrounding neighborhoods, are within the Transit Overlay District (see Section 10.04 – p. 131-132). This overlay district requires that a “public sidewalk or recreation path connects” all land development to “a public roadway identified as a transit route on the Transit Overlay District Map in a direct (e.g. generally shortest distance from the use to the roadway) manner.” There is a Green Mountain Transit Route on Williston Road ([#1 Williston](#))
- c. **Connectivity** – This Planned Growth Area has significant existing and planned bike/ped connectivity to centers and other parts of the city, including City Center via a multi-use path on Kennedy Drive and Dorset Street. The City [Official Map](#) shows existing infrastructure and where the City is actively planning to acquire development rights from landowners to create new paths and trails. This includes a future connection to Taft’s Corners in Williston which will assist with the regional vision of bike/ped connectivity between downtown Burlington and Taft Corners (see [Regional Active Transportation Plan](#)).

d. **Employment** – Per the Vermont Department of Labor, South Burlington had the second highest “average employment” and “establishments” of any municipality in Vermont in 2024. Average employment is a rough approximation of total jobs and establishments means employers. Data on the exact location of these jobs within South Burlington is not available. Regardless, it is important to note the importance of South Burlington as a center of employment in Vermont when considering the geography of the PGA.

<b>Total, All Industries - Total Covered Employment - 2024</b>		
<b>Area</b>	<b>Establishments</b>	<b>Average Employment</b>
Burlington city	2,577	35,995
South Burlington city	1,586	18,866
Rutland city	928	12,599
Williston town	944	11,072
Brattleboro town	919	10,055
Colchester town	801	9,847
Montpelier city	769	9,585
Bennington town	707	9,305
Middlebury town	533	8,366
St. Albans city	539	7,209

Figure 4 - Total Covered Employment 2024