

TO: Lamoille County Planning Commission
FROM: Vermont Department of Housing & Community Development
DATE: February 12, 2026
RE: Lamoille County 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).
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Process

- The **Lamoille County Planning Commission (LCPC)** submitted a pre-application to LURB on **January 21, 2026**.
- The LURB provided notice to partner agencies on **January 29, 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](#) is presently considering a proposed 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	24	
Total New	13	54%
Total Legacy	11	46%
Centers	20	
Step 1 Centers Proposed	8	40%
Step 2 Center Proposed	10	50%
Step 3 Centers Proposed	2	10%
<i>Legacy Centers</i>	<i>11</i>	
<i>New Center</i>	<i>9</i>	
<i>Legacy Centers Eliminated</i>	<i>1</i>	
Neighborhoods	4	
Planned Growth Area Neighborhoods	3	75%
Village Area Neighborhoods	1	25%
<i>Legacy Neighborhoods</i>	<i>0</i>	
<i>New Neighborhoods</i>	<i>4</i>	

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)). LCPC 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 Lamoille County as established in the statewide and regional housing targets are 1,959 during the period of 2025-2030, and 6,621 during the period of 2025-2050, indicating average annual unit creation in the County of 392 per year to achieve the 2030 target or 265 per year to achieve the 2050 target.

According to the [DHCD Housing Development Dashboard](#), Lamoille County achieved the highest proportion of their housing targets of all counties in 2025, though the current rate of production still puts Lamoille County far behind the pace for their upper 2030 housing targets. Lamoille County is on pace to build 1,034 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, Lamoille County only permitted an average of 112 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 LCPC 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

GIS/Mapping Data Standard

Elements of the mapping do not conform with the adopted data standard prepared by the RPCs and enacted by the EGC.

Mapping does not indicate the political boundaries of the villages vs. the towns in Cambridge, Hyde Park, Morristown, Johnson, etc. Anything that meets definition of a municipality in Chapter 117 should be mapped as a municipality; the Vermont Planning Data Center lists these as separate municipalities. The LURB/ACCD mapper added the village boundary layer to the viewer, although they may not match more accurate regional data layers.

All centers and neighborhoods lack names and the map groups all like FLUAs together as a single feature within a municipality. Each center and neighborhood associated with the center should be a separate and named feature for designation and 1B/1A data tracking. Where the village and town are

defined as separate municipalities under the act, each area should be a separate feature by municipality. See Vergennes in ACRPC's map (done correctly).

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 LCPC centers mapping. In some cases, these areas may be more appropriately mapped as another FLUA, which may include FLUAs that qualify designated neighborhoods.

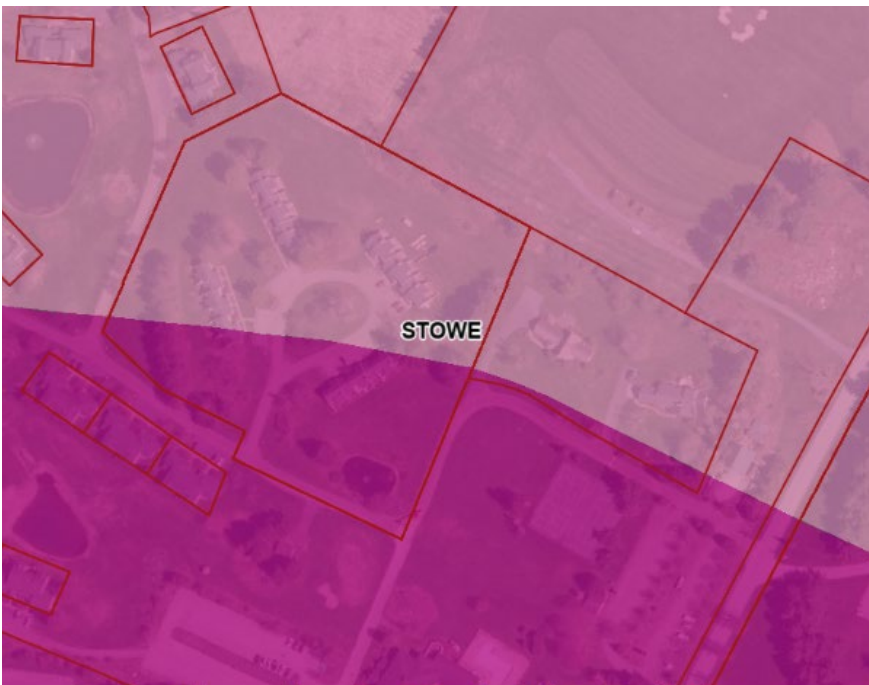
Flood Hazard (FH) & River Corridor (RC) Areas in Proposed Neighborhoods

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.

Expansion of 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.

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.



Small Enterprise FLUAs and Mapping Issues

There are instances where the Enterprise Areas shows as slivers or occur for just one parcel, including what appears to be a mobile home park. If this is a mobile home park, this does not conform with the definition of an enterprise area.



Dense Development for Proposed Planned Growth Area Neighborhoods

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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.