



Lamoille County Planning Commission

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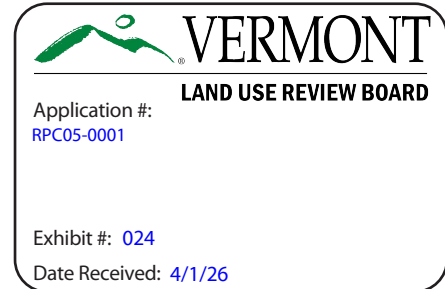
MEMORANDUM

To: Brooke Dingledine

Cc: Land Use Review Board

FROM: Lamoille County Planning Commission

DATE: April 1, 2026



RE: **LCPC Preapplication Review Response-Supplemental Information**

The Lamoille County Planning Commission appreciates the Vermont Land Use Review Board's (LURB) review of the 2026 draft Lamoille County Regional Plan. On March 6th, 2026, the LCPC received a formal letter of comment on the draft Plan. We received guidance at the LURB meeting held on Monday, March 9, 2026. A final formal letter of comment was received from the LURB on March 23rd, 2026.

This memo summarizes the changes the LCPC has made to address "required" comments from the LURB. Key Regional Plan elements and Future Land Use map updates in response to the LURB's final letter of comment are attached to this memo. Prior to the warning of the final Public Hearing, the LCPC will post revised chapters of the 2026 Regional Plan on our web page to include changes addressed in response to the LURB's letter of comment issued on March 23rd, 2026.

ENVIRONMENTAL JUSTICE

Per Act 154 (Environmental Justice Law) the LURB requested the LCPC further address environmental benefits and burdens in the Regional Plan and provided the following (abbreviated) guidance with the LURB's formal letter of comment:

Required Revisions: The draft plan appears to be inconsistent with Goal 15.

Environmental Justice should be further detailed in the plan. Revise the plan to provide a robust description of environmental benefits and burdens, providing an analysis of how these are distributed across the county. Describe or address environmental justice focus populations as described in 3 V.S.A. chapter 72. Detail the public engagement process and the populations engaged in the content of the plan to meet statutory requirements.

LCPC's Response: New Benefits and Burdens Analysis

-
- Municipal & Regional Planning • Transportation Planning • Emergency Preparedness Planning • GIS Mapping Services • Grant Administration • Census Data •

In response to the above comment regarding Goal 15 and Act 154, the LCPC drafted an Appendix D: Environmental Benefits and Burdens Analysis. This mirrors a similar format used by NRPC to address environmental justice topics and highlights a narrative and mapping analysis of benefits/burdens for Lamoille County. See Appendix D below.

The LCPC also notes key findings from the benefits/burdens analysis and implementation steps in the revised Introduction of the Regional Plan located under the Equity Analysis section (see attached). Environmental Justice and Health Equity planning outreach focus groups are now highlighted in the revised Introduction (Equity Analysis Section) and expanded upon in both a narrative and mapping analysis in Appendix D.

LAMOILLE COUNTY REGIONAL PLAN 2026-2034

are made at the local level and promote meaningful public engagement

- Develop and provide information about Lamoille County and its communities to aid in a well-informed local decision-making process
- Facilitate information sharing of planning communications and resources between local, state, and federal governments
- Balance the region’s economy with the natural environment and resource base and protect working lands
- Promote regional and local planning activities that support the well-being of Lamoille County communities, residents, and visitors
- Support and encourage other local/regional organizations working towards enhancing the quality of life for all Lamoille County residents and visitors

Plan Themes

Health Equity and Environmental Justice

Themes of health equity and environmental justice are incorporated throughout the Lamoille County Regional Plan in chapter policies and action items. The Lamoille County Planning Commission, regional partners, municipalities, and residents can play an important role in promoting the health and well-being of Lamoille County communities. Wellness, in its broadest sense, includes not only physical health but also mental, emotional, social, and environmental well-being. All these aspects of wellness contribute to a vibrant, thriving community. By addressing various aspects of health, municipalities can create an environment where individuals are aware of the resources and opportunities needed to live healthier, more fulfilling lives. For a one-stop-shop site to find resources like food, housing, financial assistance, health care, and more visit <https://www.findhelp.org/>. As defined by the Centers for Disease Control and Prevention, health equity is “the state in which everyone has a fair and just opportunity to attain their highest level of health”. Achieving this requires ongoing efforts to overcome economic, social, and other obstacles to health to reduce health disparities. Health equity in community planning links traditional concepts of planning (land use, transportation, facilities, parks and open space, adequate/safe housing) with health themes such as physical activity, public safety, healthy food access, mental health, air and water quality, and social well-being. For more information on health equity planning visit the Health Equity Planning Toolkit at <https://www.lpcvvt.org/healthequitytoolkit>.

In accordance with Vermont Act 154 and Act 181, environmental justice is incorporated throughout

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the Regional Plan and considered in the policies and actions of this plan. Similar to health equity, Vermont's first Environmental Justice law (Act 154) seeks to address environmental health disparities and improve the health and well-being of all Vermont residents. According to the Vermont Agency of Natural Resources, "the purpose of the Environmental Justice Law is to ensure all Vermonters regardless of race, cultural background, or income have equitable access to environmental benefits such as clean air and water, healthy food, and public transportation. The Environmental Justice Law also protects communities from disproportionate environmental burdens such as polluted air and water, climate change impacts, and limited access to green spaces." In line with the Vermont Environmental Justice Law and Act 181, the LCPC promotes meaningful engagement in regional and local decision-making processes. During the 2023 and 2026 update of the Lamoille County Regional Plan, the LCPC conducted meaningful public engagement highlighted in the "Public Engagement" section below. In Lamoille County, from 2022-2024 the LCPC conducted outreach around Health Equity to priority populations using a variety of methods to inform the development of the Health Equity Planning Toolkit, the Regional Plan update, and Municipal Plan updates for the Towns of Cambridge, Elmore, Hyde Park, and Wolcott. Outreach methods conducted by LCPC under the Health Equity Grant included the following:

- Conducted a Health Equity Survey distributed to Lamoille County municipalities and health partners via email and community members via Front Porch Forum
- Conducted a community health assessment survey and tabling at the Wolcott Annual Community Barbecue
- Conducted trainings/ a Walking Audit in Wolcott Village
- Conducted a health equity survey to inform recreation/community green space planning efforts for the new Elmore Town Garage property
- Direct outreach to the Lamoille Area Racial Equity Alliance
- Direct outreach to Vermont State University-Johnson Campus support group for new African American students
- Outreach to health partners working with priority populations including the local Health District Office, Lamoille Health Partners, and Healthy Lamoille Valley
- Public meetings with local Planning Commissions/ Selectboards in rural communities
- Held Regional Plan update information sessions
- Held Regional Health Equity trainings
- Front Porch Forum (online community forum postings)
- Regional Plan update flyer distribution in public spaces and local grocery/hardware stores

Environmental Justice/ Health Equity Focus Populations reached during 2023 and 2026 outreach for the Regional Plan update are highlighted in the table below and discussed in further detail in Appendix D of the Regional Plan.

LAMOILLE COUNTY REGIONAL PLAN 2026-2034

| | |
|---|---|
| Environmental Justice/ Health Equity Focus Populations | |
| X = Populations reached during Health Equity Grant outreach, and Regional Plan update public engagement during the 2023 and 2026 Plan update. | |
| Persons of color and Indigenous peoples | X |
| LGBTQ+ community | X |
| Low-income households | X |
| Rural communities | X |
| Households with limited English proficiency | |
| Migrant workers | X |
| People experiencing homelessness | X |
| People living with a disability | X |

Equity Analysis

The devastating flooding that occurs on a regular basis in Lamoille County hits marginalized and low-income households the hardest. This occurrence highlights how environmental burdens related to flooding and natural hazards are impacting low income and marginalized communities the most in Lamoille County. Since the July 2023 flood, the LCPC has worked closely with LeARN (Lamoille Area Recovery Network) to conduct direct outreach to flood victims who were displaced during recent flooding events. This collaboration with LeARN involves outreach regarding individual assistance, navigating buyout programs and funding sources, and planning for future flood mitigation projects in flood impacted areas such as Cambridge Village, Jeffersonville, Johnson Village, Wolcott Village, and along the Wild Branch in Wolcott.

These rural communities residing along the Main Stem of the Lamoille River experienced substantial damages because of the federally declared disaster DR-4720 (the “July 2023 floods”). The July 2023 flood imposed significant damage on Wolcott’s designated Village Center, including inundating the fire department, town garage, and individual septic systems and leach fields. Transportation infrastructure was also heavily impacted, including damage to a critical town culvert under School Street, the primary road into the Village core. Flat Iron Road (the only other route out of the Village when School Street is inundated), was completely eroded down to bedrock and needed to be rebuilt and riprapped. As a result of DR-4720, the Town of Wolcott approved eight (8) residential property buyouts. The loss of this revenue on the Grand List is amplified with

additional debt taken on to respond to and recover from flood damages – the Town took on a \$1,000,000 loan to repair damaged local infrastructure. Like Wolcott, Johnson Village homes, businesses, and critical infrastructure were severely impacted in the DR-4720 flood event. The event resulted in \$3,738,093 to date in public assistance for the community. This figure is a low estimate that does not include losses and damage to the wastewater treatment facility, which was under several feet of water and remains in a vulnerable condition. In July 2023, the village cores of Cambridge Village and Jeffersonville Village were fully inundated. During this event, forty-six (46) private structures including senior housing, residences, businesses, and religious institutions sustained significant flood damage with many requiring evacuations. Eight (8) residential structures totaling fourteen (14) dwelling units in the Village of Cambridge are in the buyout process.

Other substantial impacts were also experienced in subsequent disasters: DR-4744 (August 2023 floods), DR-4762 (December 2023 floods), and DR-4810 (July 2024 floods). Some of the hardest hit communities and businesses were in the central stretch of the Lamoille River in Lamoille County including Wolcott, Johnson, Jeffersonville, and Cambridge Village. The table below captures the correlation between the communities along the Main Stem of the Lamoille River impacted the most during the July 2023 flood and median Household Income by Census Designated Place.

| Census Designated Place (CDP) | Median Household Income (MHI) [°] | % Low-to-Moderate Income (LMI)** | # LMI Persons** |
|-------------------------------|--|----------------------------------|-----------------|
| Wolcott | \$39,904 | 75% | 135 |
| Johnson Village | \$48,355 | 70% | 835 |
| Jeffersonville | \$57,083 | 52% | 665 |
| Cambridge Village | \$50,595 | 44% | 240 |

Census Designated Places correspond closely with the geography of flood impacts experienced in the hardest hit communities along the Lamoille River in Lamoille County.

***Source: Low-to-Moderate Income Data, Map Application, based on the 2016-2020 American Community Survey*

°Source: U.S. Census

Findings: Environmental Benefits & Burdens

A. Environmental Benefits

Lamoille County possesses significant and broadly distributed environmental assets:

- More than 80% of the Region’s land area is conserved by State, local, or nonprofit organizations or enrolled in Vermont’s Current Use Program, protecting air and water quality and providing land for passive recreation.

- Extensive State Forests, State Parks, and town-owned lands provide publicly accessible recreational opportunities.
- Protection of forestland and floodplains enhances natural flood water attenuation and benefits downstream communities throughout the Region.

However, these benefits are not equitably distributed. Fee-based recreational access limits use by lower-income households. The same high concentration of conserved land that provides ecological benefits constrains the land available for housing development and infrastructure investment, creating indirect burdens for residents with fewer economic choices.

B. Environmental Burdens

The following environmental burdens were identified through LCPC’s analysis. Burdens are presented by topic area. These findings are expanded upon in the Environmental Justice Focus Population Maps section at the end of this Appendix.

| Factor | Key Findings |
|---|--|
| Housing Stock Age & Hazardous Materials | Median housing age exceeds 48 years in Morrisville, Waterville, Hyde Park, Wolcott, and Stowe, indicating elevated risk of lead paint and PCB exposure (banned 1978–79). Cambridge, Johnson, Elmore, and Eden have median ages suggesting potential asbestos exposure (restricted beginning 1989). Belvidere is the only town with median housing age under 37 years; however, its proximity to the Eden asbestos mine warrants continued monitoring. |
| Income & Low-to-Moderate Income (LMI) Populations | At the town level, only Eden has 50% or more LMI population. At the CDP level, Jeffersonville Village, Johnson Village, North Hyde Park CDP, and Wolcott CDP each have LMI populations of 50% or greater. Town-level data alone understates economic need in village areas and creates barriers to accessing income-based infrastructure funding. |
| Housing Cost Burden | In all Lamoille County communities except Hyde Park, at least 10% of households are severely cost-burdened (paying more than 50% of income on housing). In Stowe and Cambridge, 35% or more of households are cost-burdened. At the CDP level, Cambridge Village, Jeffersonville Village, Johnson Village, Wolcott CDP, and Hyde Park Village CDP all show 40% or more of households experiencing cost burden—substantially higher than town-level figures. As |

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|---|--|
| | <p>communities lose housing through the buy-out process in the floodplain, rural communities in Lamoille County are facing an increase in local tax burden and a continued financial strain on limited, aging housing stock.</p> |
| <p>Flood Risk</p> | <p>The Region faces significant flood risk exposure, particularly in and around river corridors. Many village centers—where lower-income populations are concentrated—are located within or adjacent to floodplains, creating disproportionate exposure to flood hazards and associated recovery costs.</p> |
| <p>Water & Wastewater Infrastructure</p> | <p>Aging and inadequate drinking water and wastewater infrastructure affects both public systems and private wells and septic systems throughout the Region. Communities with lower LMI thresholds based on town-level data face difficulty qualifying for income-based infrastructure funding despite significant CDP-level need.</p> |
| <p>Access to Recreation & Green Space</p> | <p>While extensive conserved land exists, equitable public access is uneven. Privately owned recreational amenities—including ski resorts—require fees. Residents in lower-income communities have less discretionary income to access these assets. Historically brownfield sites and chemical based industries have been located in areas with marginalized populations and in Village and Downtown Centers. Brownfields remediation presents an opportunity to address this inequitable pattern and provide additional access to community green space in Downtown and Village Centers.</p> |

Equity Assessment

Based on the analysis above, LCPC finds that several environmental burdens disproportionately affect Environmental Justice focus populations in Lamoille County:

- Hazardous building materials risk is concentrated in older housing stock located in the Region’s most economically vulnerable communities.
- Housing cost burden is severe and widespread, with village CDPs—where lower-income households are concentrated—experiencing the most acute conditions.
- Flood risk disproportionately affects lower-income households in village centers who have fewer financial resources to invest in flood resilience or relocation.

- Infrastructure deficiencies in water and wastewater systems are concentrated in areas with demonstrated economic need, yet income-based funding mechanisms often fail to capture CDP-level poverty due to the use of town-level data.

LCPC acknowledges the limitations of this analysis. Census data can be unreliable at small geographic scales. Some benefits and burdens cannot be fully quantified with available data. This framework represents one approach to equity analysis; there may be additional burdens disproportionately affecting historically marginalized residents that are not fully captured by the statutory mapping framework.

Regional Plan Policies and Implementation Strategies

To reduce identified disparities and ensure the equitable distribution of benefits and mitigation of burdens, the Lamoille County Regional Plan includes the following implementation strategies:

Land Use and Conservation

- Prioritize conservation efforts that enhance flood mitigation and provide meaningful public access, including strategies that support dual goals such as conservation paired with housing or infrastructure siting.
- Support equitable public access to conserved lands while balancing the needs of diverse user groups, including lower-income residents and persons with disabilities.
- Direct new development to higher ground near village centers outside of floodplain areas, consistent with the Regional Plan Future Land Use Map.

Housing and Infrastructure

- Advocate for the use of CDP-level income and cost burden data in State and federal funding programs for drinking water, wastewater, and housing investment, to ensure that village-area need is accurately represented in program eligibility determinations.
- Support public and private investment in the existing housing stock, including hazardous materials abatement (lead, asbestos, PCBs), code improvements, HVAC modernization, and improved drinking water and wastewater systems.
- Prioritize infrastructure investment—water, wastewater, stormwater—in the Region’s village centers to enable housing development and support existing residents.

Flood Resilience

- Support the elevation, flood-proofing, or relocation of housing in flood hazard areas, with priority given to lower-income households with the least capacity to self-finance mitigation.
- Integrate flood risk equity considerations into municipal hazard mitigation plan updates and local floodplain management programs.

Meaningful Participation

- LCPC is committed to providing meaningful participation opportunities, as defined in 3 V.S.A. §6002, in all regional planning processes. This includes ensuring that outreach and engagement activities are accessible to all residents, with particular attention to Environmental Justice focus populations, including those with limited English proficiency or limited digital access.
- LCPC will coordinate with State agencies, municipalities, and community partners to ensure that implementation of Regional Plan policies reaches the communities with the greatest need.

Relationship to Land Use Review Board Compliance

This Environmental Justice analysis is a required element of the Lamoille County Regional Plan under 24 V.S.A. §4348a. LCPC will submit this chapter and the full Regional Plan to the Vermont Land Use Review Board (LURB) for a determination of compliance pursuant to 24 V.S.A. §4348(h). The analysis demonstrates conformance with the goals established in 24 V.S.A. §4302 and the plan elements required by 24 V.S.A. §4348a, including the equitable distribution of environmental benefits and burdens.

LCPC will update this analysis as part of each Regional Plan update cycle, incorporating new Census data, updated State Environmental Justice mapping tools developed by the Agency of Natural Resources pursuant to Act 154, and community input received through the plan adoption process. The complete Environmental Benefits and Burdens Analysis and Environmental Justice Focus Populations mapping can be viewed in Appendix D of this Plan.

Primary Regional Plan Objectives:

To fulfill the Lamoille County Planning Commission's vision and mission, this plan was developed under the following primary objectives.

1. To guide growth into and near compact settlements outside the floodplain, whether historic or new, for efficient land use and development.
2. To protect the region's natural and working landscapes by promoting thriving, compact village centers and new growth centers near existing infrastructure, services, and compact housing development, while preserving the scenic character of the surrounding rural countryside.
3. To encourage affordable housing options and a diversity of housing options in Lamoille County including "missing middle" housing development to support Lamoille County's growing and aging population and to support first-time homebuyers.

Appendix D: Environmental Justice – Benefits & Burdens Analysis

Statutory Basis

The Vermont Environmental Justice Law (Act 154 of 2022, codified at 3 V.S.A. Chapter 72) establishes the State’s policy that no segment of the Vermont population should, because of its racial, cultural, or economic makeup, bear a disproportionate share of environmental burdens or be denied an equitable share of environmental benefits. The law further requires that all individuals have meaningful opportunity to participate in environmental decision-making.

Pursuant to 24 V.S.A. §4348a and 24 V.S.A. §4345a, regional planning commissions must assess the distribution of environmental benefits and burdens as defined under the Environmental Justice Law, with particular attention to disproportionate impacts on environmental justice focus populations. This appendix fulfills that requirement for the Lamoille County Regional Plan and will be submitted to the Vermont Land Use Review Board as part of the Regional Plan compliance determination under 24 V.S.A. §4348.

Key Definitions Under State Law

The following definitions, established in 3 V.S.A. §6002, apply throughout this analysis:

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| Environmental Benefits | Assets and services that enhance the capability of communities and individuals to function and flourish in society (3 V.S.A. §6002). |
| Environmental Burdens | Any significant impact to clean air, water, and land, including destruction, damage, or impairment of natural resources resulting from intentional or reasonably foreseeable causes (3 V.S.A. §6002). |
| Environmental Justice Focus Populations | Any Census Block Group in which: (1) the annual median household income is not more than 80% of the State median household income; (2) persons of color and Indigenous peoples comprise 6% or more of the population; or (3) 1% or more of households have limited English proficiency (3 V.S.A. §6002). |
| Meaningful Participation | The opportunity for all individuals to participate in energy, climate change, and environmental decision-making, including integrating diverse knowledge systems and ensuring |

communities are enabled and administratively assisted to participate fully (3 V.S.A. §6002).

From a definition standpoint Environmental Justice and Health Equity aim to achieve the same equitable outcomes. These important planning terms are defined below and an integral part of all LCPC's planning efforts. As described in the Regional Plan Introduction these concepts are woven throughout the Regional Plan content, policies, and action items. During the 2023 update of the Regional Plan the LCPC also worked closely with the Belonging and Inclusion Committee (an LCPC advisory Committee) to conduct an equity review of the Regional Plan. Prior to the 2023 Regional Plan update the LCPC served as the lead Regional Planning Commission in development of the [Health Equity Planning Toolkit](#). While working collaboratively with other RPCs and state/regional health partners, the development of the Health Equity Toolkit played a role in further emphasizing concepts of Health Equity in the 2023 Regional Plan update. Development of the Toolkit was funded by a grant through the Vermont Department of Health. The Health Equity Grant also funded various community engagement and municipal planning projects across the State of Vermont lead by the 11 Vermont Regional Planning Commissions. In Lamoille County, from 2022-2024 the LCPC conducted outreach around Health Equity to priority populations using a variety of methods to inform the development of the Health Equity Planning Toolkit, the Regional Plan update, and Municipal Plan updates for the Towns of Cambridge, Elmore, Hyde Park, and Wolcott. Outreach methods conducted by LCPC under the Health Equity Grant included the following:

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- Direct outreach to the Lamoille Area Racial Equity Alliance
- Direct outreach to Vermont State University-Johnson Campus support group for new African American students
- Outreach to health partners working with priority populations including the local Health District Office, Lamoille Health Partners, and Healthy Lamoille Valley

- Public meetings with local Planning Commissions/ Selectboards in rural communities
- Held Regional Plan update information sessions
- Held Regional Health Equity trainings
- Front Porch Forum (online community forum postings)
- Regional Plan update flyer distribution in public spaces and local grocery/hardware stores

Environmental Justice/ Heath Equity Focus Populations reached during both this 2023 outreach and more recent outreach for the 2026 Regional Plan update are referenced in the “Environmental Justice Focus Populations” section below. Outreach for the 2026 Regional Plan update is detailed in the Introduction of the Regional Plan. More recent outreach has emphasized direct outreach to focus populations for flood recovery including working with populations vulnerable to flooding through LCPC’s work with the Lamoille Area Recovery Network. This collective outreach and extensive survey data gathered during the distribution of the 2025 Regional Plan Survey (see Appendix B) helped shape policies and action items throughout the 2026 update of the Lamoille County Regional Plan.

| Term | Definition |
|-----------------------|---|
| Environmental Justice | Vermont Act 154 defines Environmental Justice as all individuals are afforded equitable access to and distribution of environmental benefits; equitable distribution of environmental burdens; and fair and equitable treatment and meaningful participation in decisionmaking processes, including the development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice recognizes the particular needs of individuals of every race, color, income, class, ability status, gender identity, sexual orientation, national origin, ethnicity or ancestry, religious belief, or English language proficiency level. |

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| | <p>Environmental justice redresses structural and institutional racism, colonialism, and other systems of oppression that result in the marginalization, degradation, disinvestment, and neglect of Black, Indigenous, and Persons of Color. Environmental justice requires providing a proportional amount of resources for community revitalization, ecological restoration, resilience planning, and a just recovery to communities most affected by environmental burdens and natural disasters.</p> |
| <p>Health Equity</p> | <p>The Center for Disease Control (CDC) states: Health equity is the state in which everyone has a fair and just opportunity to attain their highest level of health. Achieving this requires ongoing societal efforts to address historical and contemporary injustices, overcome economic, social, and other obstacles to health and health care, and eliminate preventable health disparities.</p> |

See table of underrepresented groups/ focus populations in the “Environmental Justice Focus Population” section below. This table also highlights the priority populations the LCPC reached during both the 2023 Health Equity Grant and Regional Plan update and during the 2025-2026 Regional Plan update public engagement and outreach efforts.

Purpose of This Analysis

This appendix fulfills the requirements of 24 V.S.A. §4348a by:

1. Identifying environmental benefits that affect communities within Lamoille County;
2. Identifying environmental burdens that affect communities within Lamoille County;

3. Evaluating whether benefits and burdens are equitably distributed across the Region; and
4. Recommending implementation strategies to avoid and mitigate disproportionate impacts on Environmental Justice focus populations.

Analytical Approach and Methodology

Vermont Statute (24 V.S.A. §4345a) identifies 36 examples of environmental benefits and burdens. LCPC’s analysis assesses those most relevant to regional planning decisions and land use in Lamoille County. This analysis focuses on identifying existing conditions, ensuring the Plan does not worsen those conditions, and identifies opportunities to mitigate environmental burdens wherever feasible.

Geographic Unit of Analysis

LCPC conducted its analysis at the town level and for U.S. Census Designated Places (CDPs) rather than relying solely on Census Block Group data. This approach better reflects conditions in Lamoille County for two reasons:

- In rural areas, Census Block Groups can span multiple towns with substantially different income levels and demographics and may obscure environmental burdens in some communities. Further, town-level data aligns with Vermont’s municipal planning framework, where most local land use decisions are made.
- CDPs represent locally recognized unincorporated communities with distinct population concentrations that differ from surrounding rural areas in factors central to Environmental Justice analysis—including income, housing age, and infrastructure adequacy.

Where town-level data understates conditions in village areas, the CDP-level analysis is used to inform findings and policy recommendations. Both geographies are referenced in the findings below. See Environmental Justice Focus Population Maps at the end of this Appendix.

Environmental Justice Focus Populations

LCPC mapped Environmental Justice focus populations using the statutory definition in 3 V.S.A. §6002. Because the rural character of Lamoille County results in lower overall concentrations of persons of color or Indigenous peoples at the Census Block Group level, *LCPC supplemented its mapping with income-based and housing cost burden data to ensure that economically vulnerable populations are considered in the environmental justice policy making framework.* This approach is consistent with the analytical adjustments made by other Vermont regional planning commissions.

| Environmental Justice/ Health Equity Focus Populations | |
|--|----------|
| X = Populations reached during Health Equity Grant outreach, and Regional Plan update public engagement during the 2023 and 2026 Plan update. | |
| Persons of color and Indigenous peoples | X |
| LGBTQ+ community | X |
| Low-income households | X |
| Rural communities | X |
| Households with limited English proficiency | |
| Migrant workers | X |
| People experiencing homelessness | X |
| People living with a disability | X |

Findings: Environmental Benefits & Burdens

A. Environmental Benefits

Lamoille County possesses significant and broadly distributed environmental assets:

- More than 80% of the Region’s land area is conserved by State, local, or nonprofit organizations or enrolled in Vermont’s Current Use Program, protecting air and water quality and providing land for passive recreation.
- Extensive State Forests, State Parks, and town-owned lands provide publicly accessible recreational opportunities.

- Protection of forestland and floodplains enhances natural flood water attenuation and benefits downstream communities throughout the Region.

However, these benefits are not equitably distributed. Fee-based recreational access limits use by lower-income households. The same high concentration of conserved land that provides ecological benefits constrains the land available for housing development and infrastructure investment, creating indirect burdens for residents with fewer economic choices.

B. Environmental Burdens

The following environmental burdens were identified through LCPC’s analysis. Burdens are presented by topic area. These findings are expanded upon in the Environmental Justice Focus Population Maps section at the end of this Appendix.

| Factor | Key Findings |
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| Housing Stock Age & Hazardous Materials | Median housing age exceeds 48 years in Morrisville, Waterville, Hyde Park, Wolcott, and Stowe, indicating elevated risk of lead paint and PCB exposure (banned 1978–79). Cambridge, Johnson, Elmore, and Eden have median ages suggesting potential asbestos exposure (restricted beginning 1989). Belvidere is the only town with median housing age under 37 years; however, its proximity to the Eden asbestos mine warrants continued monitoring. |
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| | <p>communities lose housing through the buy-out process in the floodplain, rural communities in Lamoille County are facing an increase in local tax burden and a continued financial strain on limited, aging housing stock.</p> |
| Flood Risk | <p>The Region faces significant flood risk exposure, particularly in and around river corridors. Many village centers—where lower-income populations are concentrated—are located within or adjacent to floodplains, creating disproportionate exposure to flood hazards and associated recovery costs.</p> |
| Water & Wastewater Infrastructure | <p>Aging and inadequate drinking water and wastewater infrastructure affects both public systems and private wells and septic systems throughout the Region. Communities with lower LMI thresholds based on town-level data face difficulty qualifying for income-based infrastructure funding despite significant CDP-level need.</p> |
| Access to Recreation & Green Space | <p>While extensive conserved land exists, equitable public access is uneven. Privately owned recreational amenities—including ski resorts—require fees. Residents in lower-income communities have less discretionary income to access these assets. Historically brownfield sites and chemical based industries have been located in areas with marginalized populations and in Village and Downtown Centers. Brownfields remediation presents an opportunity to address this inequitable pattern and provide additional access to community green space in Downtown and Village Centers.</p> |

Equity Assessment

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- Housing cost burden is severe and widespread, with village CDPs—where lower-income households are concentrated—experiencing the most acute conditions.

- Flood risk disproportionately affects lower-income households in village centers who have fewer financial resources to invest in flood resilience or relocation.
- Infrastructure deficiencies in water and wastewater systems are concentrated in areas with demonstrated economic need, yet income-based funding mechanisms often fail to capture CDP-level poverty due to the use of town-level data.

LCPC acknowledges the limitations of this analysis. Census data can be unreliable at small geographic scales. Some benefits and burdens cannot be fully quantified with available data. This framework represents one approach to equity analysis; there may be additional burdens disproportionately affecting historically marginalized residents that are not fully captured by the statutory mapping framework.

Regional Plan Policies and Implementation Strategies

To reduce identified disparities and ensure the equitable distribution of benefits and mitigation of burdens, the Lamoille County Regional Plan includes the following implementation strategies:

Land Use and Conservation

- Prioritize conservation efforts that enhance flood mitigation and provide meaningful public access, including strategies that support dual goals such as conservation paired with housing or infrastructure siting.
- Support equitable public access to conserved lands while balancing the needs of diverse user groups, including lower-income residents and persons with disabilities.
- Direct new development to higher ground near village centers outside of floodplain areas, consistent with the Regional Plan Future Land Use Map.

Housing and Infrastructure

- Advocate for the use of CDP-level income and cost burden data in State and federal funding programs for drinking water, wastewater, and housing investment, to ensure that village-area need is accurately represented in program eligibility determinations.
- Support public and private investment in the existing housing stock, including hazardous materials abatement (lead, asbestos, PCBs), code improvements, HVAC modernization, and improved drinking water and wastewater systems.
- Prioritize infrastructure investment—water, wastewater, stormwater—in the Region’s village centers to enable housing development and support existing residents.

Flood Resilience

- Support the elevation, flood-proofing, or relocation of housing in flood hazard areas, with priority given to lower-income households with the least capacity to self-finance mitigation.
- Integrate flood risk equity considerations into municipal hazard mitigation plan updates and local floodplain management programs.

Meaningful Participation

- LCPC is committed to providing meaningful participation opportunities, as defined in 3 V.S.A. §6002, in all regional planning processes. This includes ensuring that outreach and engagement activities are accessible to all residents, with particular attention to Environmental Justice focus populations, including those with limited English proficiency or limited digital access.
- LCPC will coordinate with State agencies, municipalities, and community partners to ensure that implementation of Regional Plan policies reaches the communities with the greatest need.

Relationship to Land Use Review Board Compliance

This Environmental Justice analysis is a required element of the Lamoille County Regional Plan under 24 V.S.A. §4348a. LCPC will submit this chapter and the full Regional Plan to the Vermont Land Use Review Board (LURB) for a determination of compliance pursuant to 24 V.S.A. §4348(h). The analysis demonstrates conformance with the goals established in 24 V.S.A. §4302 and the plan elements required by 24 V.S.A. §4348a, including the equitable distribution of environmental benefits and burdens.

LCPC will update this analysis as part of each Regional Plan update cycle, incorporating new Census data, updated State Environmental Justice mapping tools developed by the Agency of Natural Resources pursuant to Act 154, and community input received through the plan adoption process.

Environmental Justice/ Focus Population Maps

Map 1 Below, the Environmental Justice Focus Populations map, demonstrates both towns and Census Designated Places highlighting households with median income below 80% of the State median household income. The Town of Johnson falls in this category as well as Cambridge Village, Johnson Village, and North Hyde Park Village. This first map below also shows the communities of Belvidere, Johnson, Morristown, and the Stowe Downtown Center (Census Designated Place) is home to 10 percent or

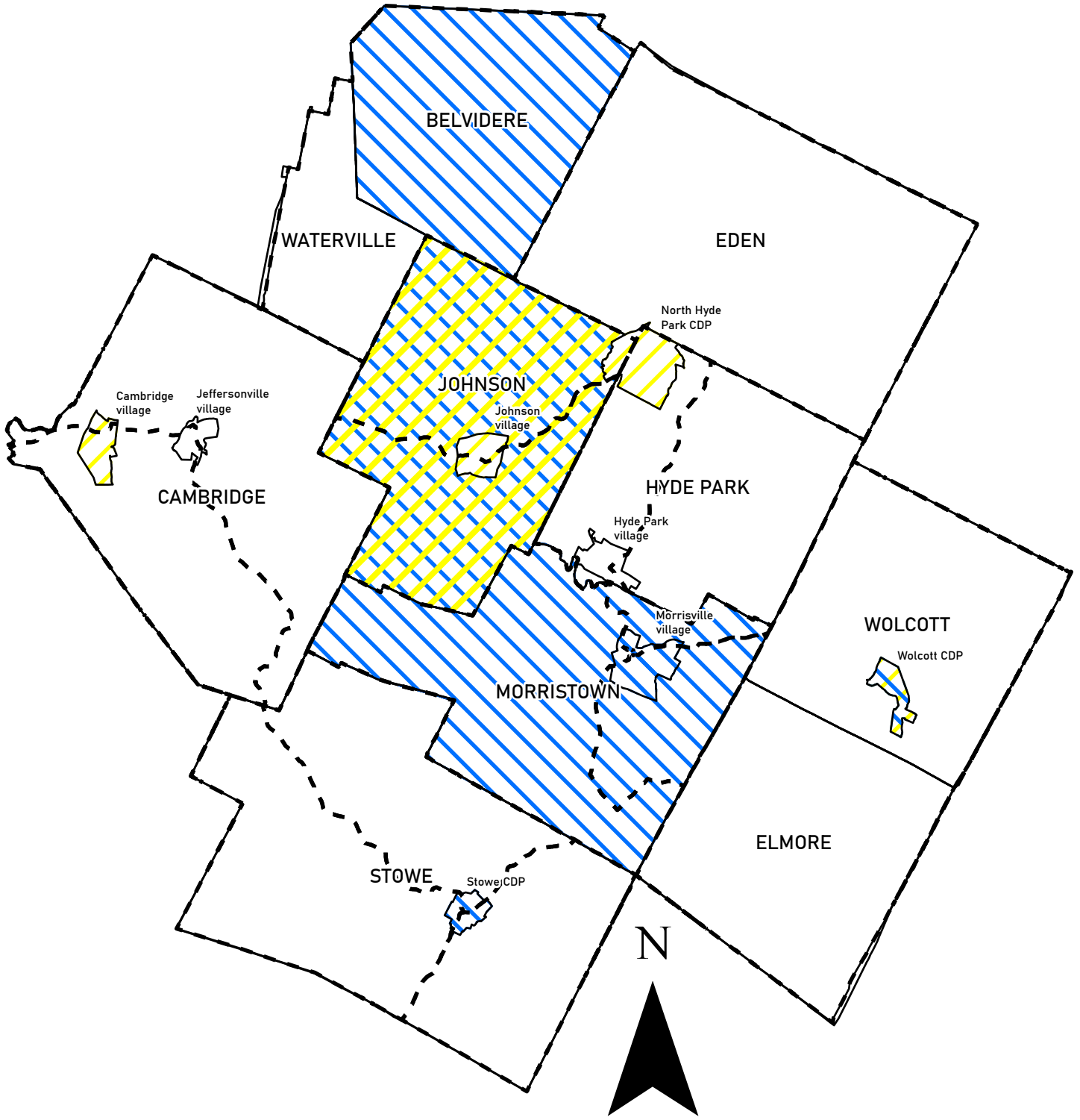
greater of people of color or indigenous. As documented in map 1 below, Lamoille County does not have reported communities of one percent or greater of households with limited English proficiency.

Map 2 Below takes a different look at income disparities in Lamoille County. This map shows communities with over 50% of low to moderate income households as well as ageing housing stock. This map highlights the Census Designated Places which meet this low to moderate income category including the Villages of Jeffersonville, Johnson, North Hyde Park, and Wolcott. The Town of Eden also has 50% or greater of low to moderate income households. The oldest housing stock (greater than 48 years old) in Lamoille County resides in the Towns of Morrystown, Hyde Park, Stowe, and Waterville. Except for Belvidere, the remaining Lamoille County Towns (Cambridge, Eden, Elmore, Johnson, and Wolcott) still have an average age of housing stock from 37-48 years old.





Map 3 below focuses on housing cost burden. This map demonstrates that all towns in Lamoille County except for Hyde Park have greater than ten percent of homeowners/renters spending half of their income on housing costs. When referring to homeowners this includes second homeowners as well. This map highlights varying levels of cost burden including demonstrating the towns of Eden, Elmore, Hyde Park, and Morrystown have greater than 30% of households that spend 1/3 or greater of their income on housing costs. Towns represented as severely cost burdened (greater than 35% of homeowners/renters spending 1/3 or more on housing cost) include Cambridge and Stowe. Meanwhile, the Villages of Cambridge, Jeffersonville, Johnson, Hyde Park, and Wolcott (represented by Census Designated Places) are also cost burdened with 40% of homeowners/renters experiencing housing cost burden.

Environmental Justice Focus Populations

Lamoille County

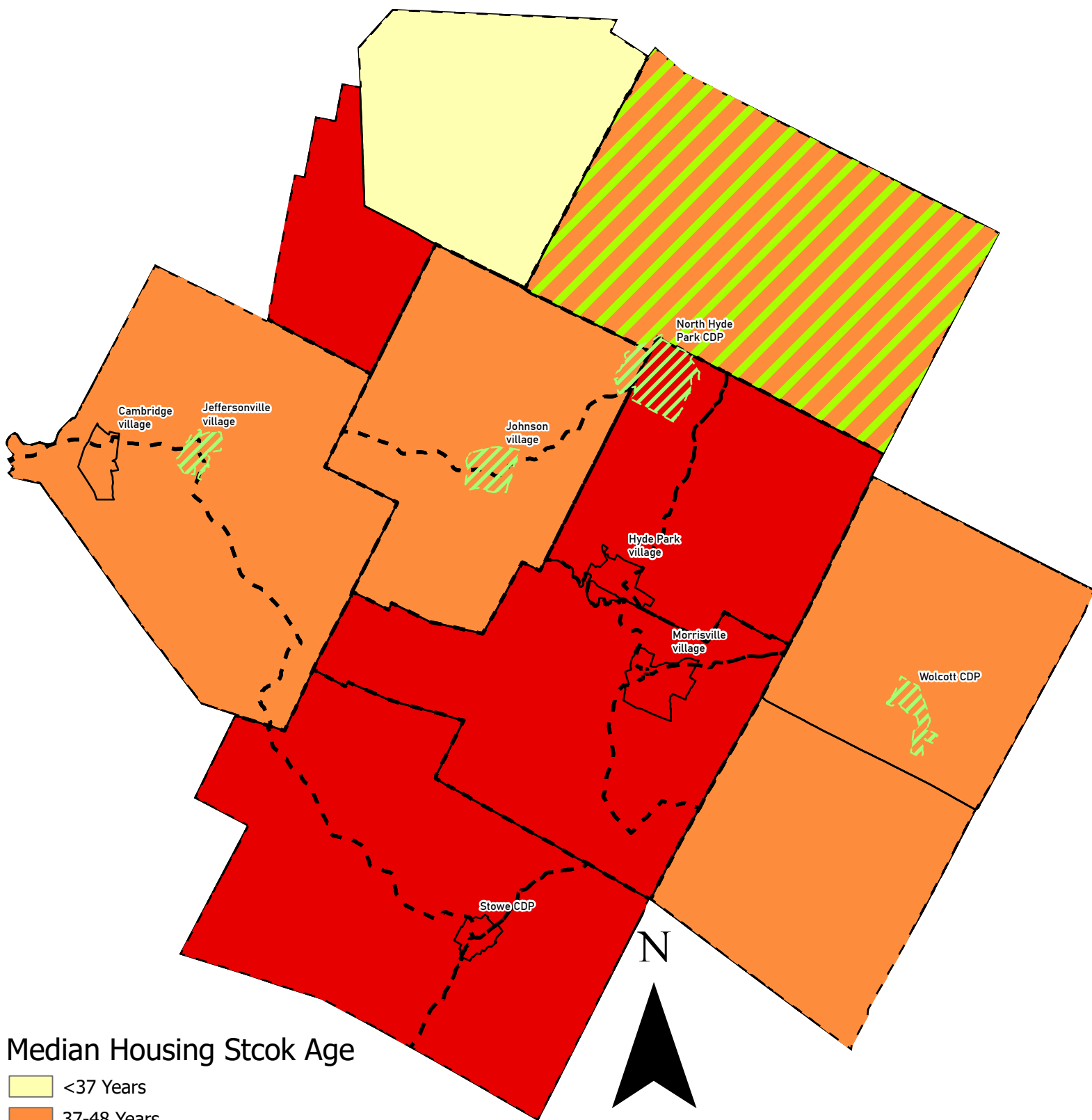


Legend

-  Lamoille_Census Blocks
-  Median Income Below 80% of State Median
-  ≥10% People of Color or Indigenous
-  ≥1% of Households with Limited English Proficiency

Sources:
U.S Census

Median Housing Stock Age and Income Levels Lamoille County



Median Housing Stock Age

<37 Years

37-48 Years

>48 Years

Low to Moderate Income Population Above 50%

Lamoille_Blocks

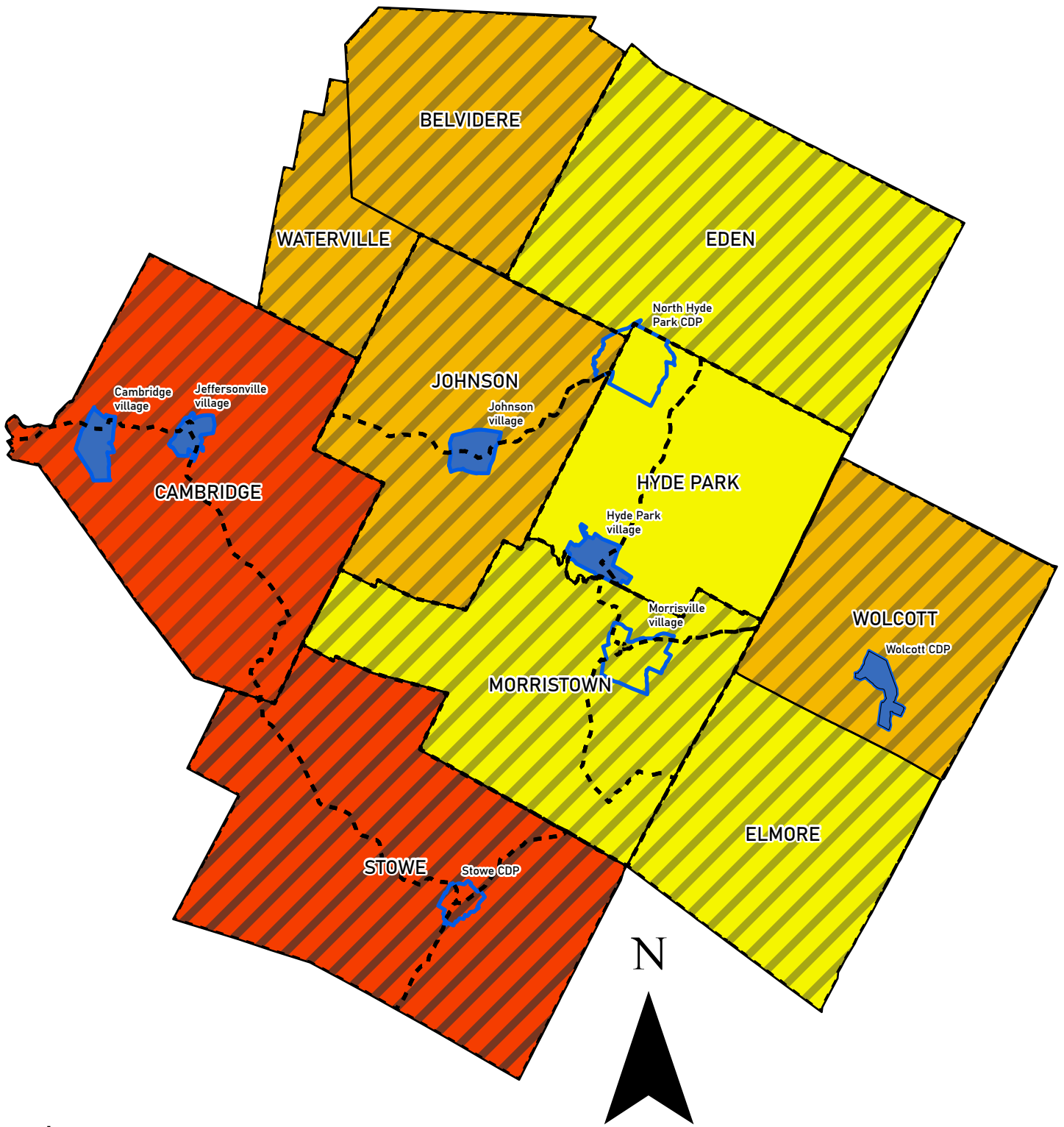
N










Sources:

Lamoille County/Hardwick Regional Housing Assessment, 2024
Vermont Housing Finance Agency, 2023

Housing Cost Burden in Lamoille County



Legend

-  Towns with >10% of Homeowners/Renters paying half of their income on Housing
-  <30% of Homeowners/Renters paying 1/3 or more of their income on housing
-  30% -35% of Homeowners/Renters paying 1/3 or more of their income on housing
-  >35% of Homeowners/Renters paying 1/3 or more of their income on housing
-  Census Designated Places
-  CDPs with 40% of Homeowners/Renters Experiencing Housing Cost Burdens
-  Census Blocks

Sources: Esri Canada, Esri, HERE, Ga, 2024 ACS (data.census.gov)

FUTURE LAND USE MAP

Johnson

In the formal letter of comment issued March 23rd, 2026, the LURB provided the following comment and required revision regarding an Enterprise Area parcel mapped in Johnson:

Required Revision: The Board does not have sufficient information to conclude that the proposed enterprise areas meet the statutory standards for an enterprise area.

Additional information or Requested Revision:

Explain the single-parcel Enterprise FLU area on the south side of Plot Road, or simply redesignate as Rural Agriculture/Forestry. Appears to be undeveloped forest owned by the town on a parcel with no road frontage.

LCPC's Response: Redesignate as Rural Agriculture/Forestry.

In response to the LURB's Comment, the LCPC redesignated the single-parcel Enterprise area as Rural Agriculture/Forestry. This is reflected in the Future Land Use Map update attached.

Stowe -- Mountain Road Crossroads Village Center

The LURB provided comments requiring additional information to determine if the proposed Stowe Mountain Road Crossroads Village Center meets the statutory standards for a village center.

Required Revisions: The Board cannot determine if the proposed Stowe Mountain Road Crossroads Village Center meets the statutory standards for a village center.

LCPC's Response: Redesignate as Transition

The Future Land Use Map reflects the Town of Stowe's long-term planning strategy to prevent sprawl on the Route 108 (Mountain Road) Corridor between Downtown Stowe and the Stowe Mountain Resort. This strategy involves focusing development into two designated "nodes." These nodes are referred to as the "Mountain Road Village" (MRV) near the intersection of Router 108 and Luce Hill Road and the "Mountain Road Crossroads" (MRC) near the intersection of Route 108 and Edson Hill Road. The Town's local zoning and sewer connection policies are designed to maintain relatively lower densities between these two nodes, and specifically between the Mountain Road Crossroads and Stowe Mountain Resort.

The Town of Stowe is also currently engaging in a comprehensive effort to support additional workforce housing. This is an important, regionally significant effort due to the need create workforce housing close to major regional employers and outside of flood hazard areas.

At this point in time, the Downtown and Mountain Road Village Center are the Town's priorities for public infrastructure investment. LCPC and the Town of Stowe agree to remapping the Mountain Road Crossroads as a Transition Area rather than a Village Center. As with other Transition Areas identified in the Lamoille County Regional Plan, this designation may be revisited as local priorities evolve, especially if housing targets cannot be met within existing Downtown and Village Centers. This change is included in the updated land use map.

Stowe -- Downtown Center

In the formal letter of comment issued March 23rd, 2026, the LURB provided the following comment and required revision regarding large undeveloped and forested parcels on the periphery of Stowe's Downtown Center. The LURB's comments are as follows:

Required Revisions:

The Board is unable to determine whether the proposed Stowe Downtown Center meets the statutory standards for a downtown center.

Additional Information Required: Substantiate the inclusion of the large undeveloped and forested areas on the periphery of the existing downtown center including:

- 1) northeast area, south of Route 100 across from the Cemetery Road intersection;
- 2) northwest area, west of Route 108. Additional information may include municipal land use plans, studies, or activities for these areas.

LCPC's Response:

The Downtown Area was initially mapped to follow the boundaries of the VR-40 District identified in the Town of Stowe Zoning Bylaws. The LURB has raised questions about the following specific areas:

northeast area, south of Route 100 across from the Cemetery Road intersection (Note: This area will be referred to as the "Sunset Rock Area" in the remainder of this memo).

The Sunset Rock Area consists of three parcels – the property containing the Sunset Storage Tank (an element of the municipal water system), the Town owned Sunset Rock property (subject to a conservation easement held in-perpetuity by the Stowe Land Trust and VHCB), and a privately owned property containing steep, wooded hillside. The Sunset Rock Area provides a forested backdrop to Downtown Stowe. Two of the properties are publicly owned and unlike to be developed. The remaining private property is above the elevation for

connection to the existing municipal water system Sunset Rock area will be reclassified as Rural General and removed from the Tier 1B Designation.

northwest area, west of Route 108 (Note: This area will collectively be referred to as the “Cady Hill Area” in the remainder of this memo)

This area consists of two parcels -- a private property served by sewer and water and the Town-owned Cady Hill Forest. The Cady Hill Forest is actively managed for recreation, specifically mountain biking, and is a major draw for tourism and outdoor recreation in the area. According to the Cady Hill Forest Management Plan, Cady Hill, “welcomed an estimated 92,000 unique visitors [in 2024], solidifying its role as the centerpiece of mountain biking in Stowe.”

After conferring with the Town of Stowe, LCPC proposes that both properties remain in the Downtown FLU and Tier 1B designation. The privately owned property is served by appropriate infrastructure. Existing zoning allows high density within a well-designed PUD. Including the Cady Hill Forest in the Downtown Area is consistent with the approach used for similar properties elsewhere in the Region.

Stowe -- Planned Growth Area

In the formal letter of comment issued March 23rd, 2026, In the formal letter of comment issued March 23rd, 2026, the LURB provided the following comment and required revision regarding undeveloped parcels in the Flood Hazard Area Overlay mapped in Stowe’s Planned Growth Area:

Required Revisions: The proposed Stowe Planned Growth Area appears not to meet the statutory standards for a planned growth area.

Provide a justification for inclusion or select a different FLU area type for some Planned Growth Areas that fall within the flood hazard or river corridor areas... Examples of areas to redesignate include:

- Area near West Hill Road along the Little River
- Area between Route 100 and River Road along the Little River on the southwest corner of the Planned Growth FLU area
- Portions along the West Branch of the Little River on either side of Route 108. Specifically, undeveloped areas on the opposite side of the river from the developed areas along Route 108.

LCPC’s Response:

Area near West Hill Road along the Little River (Note: This area will collectively be referred to as the “Mayo Farm and Percy Park Area” in the remainder of this memo.)

This area was included in the Downtown Center, but not within the Tier 1B request. This area includes portions of Mayo Farm, Willie’s Auto Repair Garage, Percy Park, and the Swimming Hole Athletic facility. The area is served by water and sewer and connected to the sidewalk system along Mountain Road.

As noted in the LURB’s comments, much of the area is mapped within the flood hazard area overlay. LCPC proposes that the Mayo Farm and Percy Park Area remain in the Downtown Center. This reflects the fact that the privately owned parcels contain existing development that will be maintained and potentially redeveloped in the future. Mayo Farm itself is an important, actively managed public open space. The area in question contains the “special events fields” which bring substantial activity into the Town and Region.

The Mayo Farm and Percy Park Area are *not* included in the Tier 1B request.

Other Planned Growth Areas Containing Flood Hazard Areas

The Future Land Use Map will be revised so that all other areas in question that cannot be considered “infill” will be remapped as “Transition.” This will result in some properties being partially within both the Planned Growth Area and Transition Area. Note that it is important for long term regional planning that those areas outside the floodplain remain in the Planned Growth Area, as this is one of the few areas of the County that has access to water and sewer infrastructure and existing facilities for pedestrians and bicycles.

Note that the Town of Stowe is *not* requesting Tier 1B Designation for the Planned Growth Area at this time.

Morristown – Planned Growth Area

In the formal letter of comment issued March 23rd, 2026, the LURB provided the following comment and required revision regarding large undeveloped parcels in the Flood Hazard Area Overlay mapped in Morristown’s Planned Growth Area:

Required Revisions: The proposed Morristown Planned Growth Area appears not to meet the statutory standards for a planned growth area. Provide justification for inclusion or select a different FLU area type for some Planned Growth Areas that fall within the flood hazard or river corridor including:

- Between Route 100 (bypass) and Feline Loop on the southwestern side of Morrisville (large expanse of flood hazard area)
- Undeveloped fields between the Lamoille River and Harrell Street
- Undeveloped area west of the Lamoille Valley Rail Trail and west of Lost Nation Brewing

LCPC's Response:

The general approach to addressing the LURB's comments related to overlaps of the Planned Growth Area and flood hazard areas is to remap the areas in question as either Downtown or Transition. Areas containing existing development, public facilities, and/or public green spaces will be remapped as Downtown. All other areas will be remapped as Transition. The Tier 1B Boundary will also be revised accordingly.

Between Route 100 (bypass) and Feline Loop on the southwestern side of Morrisville

This references the "Clark Park" area. Clark Park is owned by the Village of Morrisville Water and adjacent to a public facility. The municipal plan supports long term planning for public amenities and improved public access in Clark Park. Clark Park will be remapped as Downtown, consistent with the approach for other municipal facilities within or adjacent to Downtowns and Village Centers.

Undeveloped fields between the Lamoille River Undeveloped fields between the Lamoille River and Harrell Street

This is a large, multifaceted area with complex topography, development patterns and hydrologic conditions. There are significant changes in elevation between the floodplain of the Lamoille River and the frontage along Harrell Street. Many parcels are partially within the flood hazard area, while also containing land safe from flooding served by critical infrastructure.

The area will be remapped based on existing development patterns, planned public facilities, and flood risk. This approach will require some parcels to be located in more than one FLU area.

The Downtown Area will be extended to include developed parcels along Brooklyn Street. The Downtown Area will also be extended down Harrell Street to include the "Harvey Property." The Harvey Property is planned for future municipal facilities and public amenities. Including this property in the Downtown is consistent with the approach used for similar properties elsewhere in the Region.

Other parcels south of Harrell Street will be remapped so that portions of properties within the flood hazard are mapped as Transition. Portions of properties outside of the flood hazard area will remain within the Planned Growth Area. This is important for long-term regional planning that those areas outside the floodplain remain in the Planned Growth Area, as this is one of the few areas of the County that has access to water and sewer infrastructure.

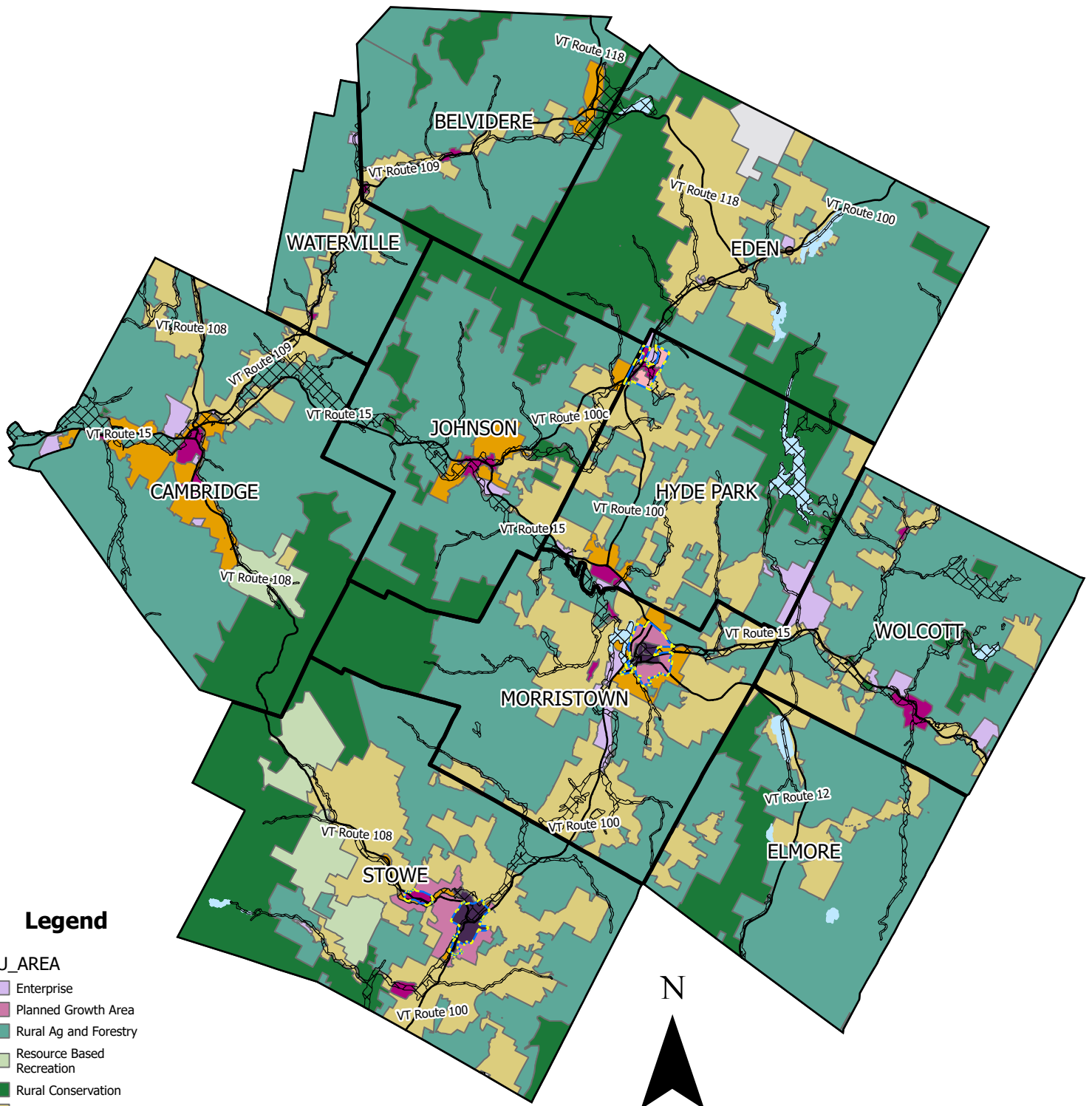
Undeveloped area west of the Lamoille Valley Rail Trail and west of Lost Nation Brewing

This area largely consists of a wooded slope between the LVRT and Lake Lamoille and is unsuited for significant development. This area will be remapped as Transition and removed from the Tier 1B Designation.

Morristown Tier 1B Boundary Revisions

This approach will result in a Tier 1 B Boundary that follows the boundary of the Flood Hazard Area rather than parcel lines. The process for formally delineating a 100-Year Flood Hazard Area requires site specific survey analysis informed by the Base Flood Elevations identified in FEMA flood studies. This level of analysis is beyond the usual scope of a Region Plan.

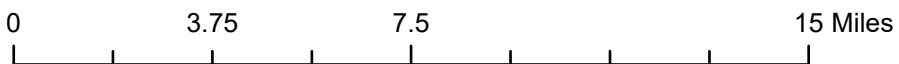
DRAFT Lamoille Future Land Use



Legend

FLU_AREA

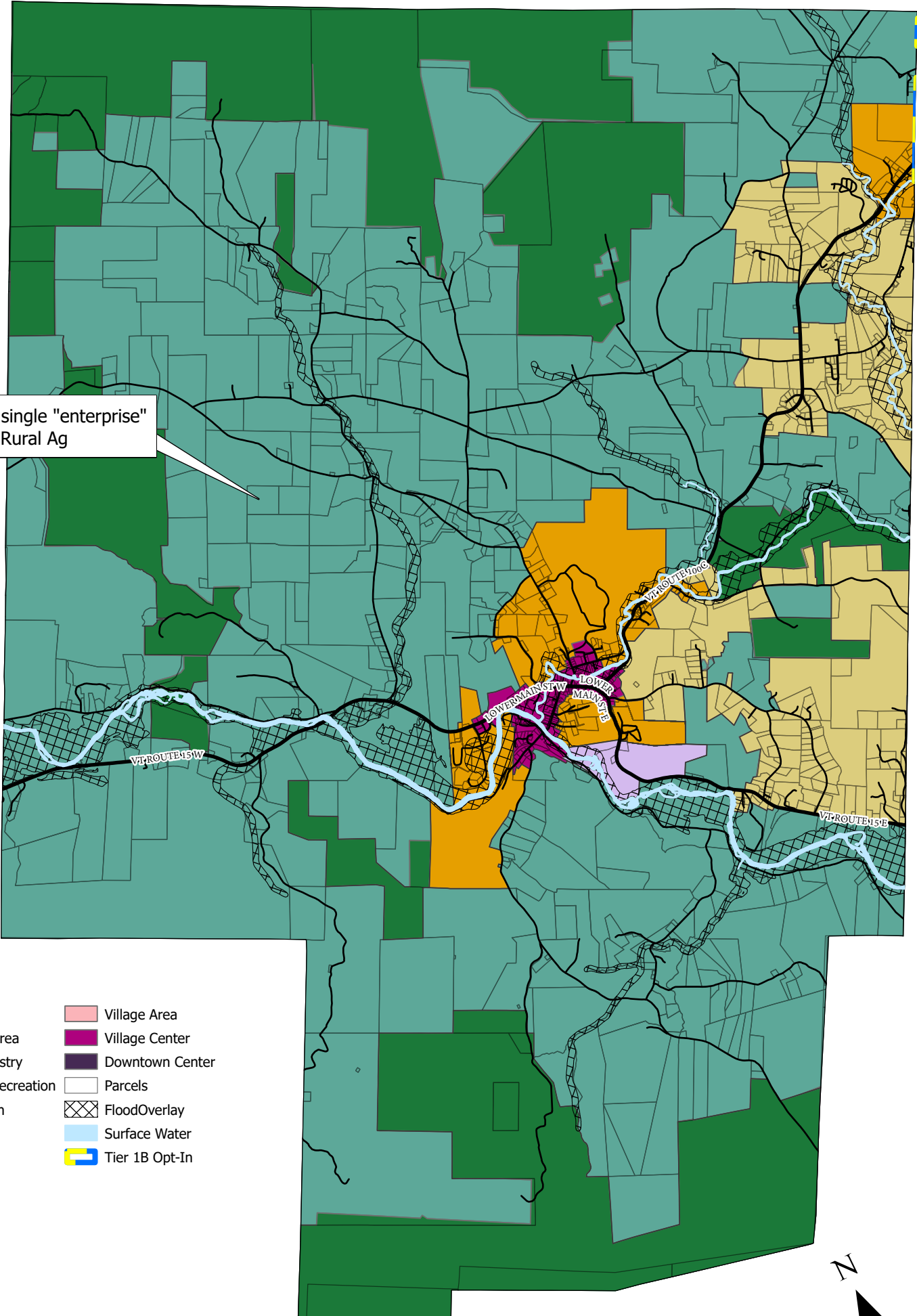
- Enterprise
- Planned Growth Area
- Rural Ag and Forestry
- Resource Based Recreation
- Rural Conservation
- Rural General
- Special Use
- Transition Infill
- Village Area
- Village Center
- Downtown Center
- FloodOverlay
- Hamlets
- Surface Water
- Tier 1B Opt-In



Future Land Use layers were digitized by LCPC staff in 2025. Staff coordinated with Town Selectboards, Planning Commissions and Village Trustees. This map is for planning purposes only and not for regulatory use.

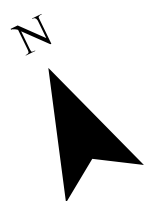
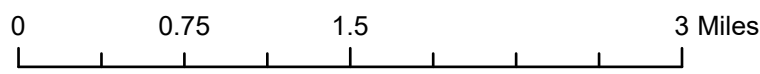
DRAFT Johnson Future Land Use

Changed single "enterprise" parcel to Rural Ag

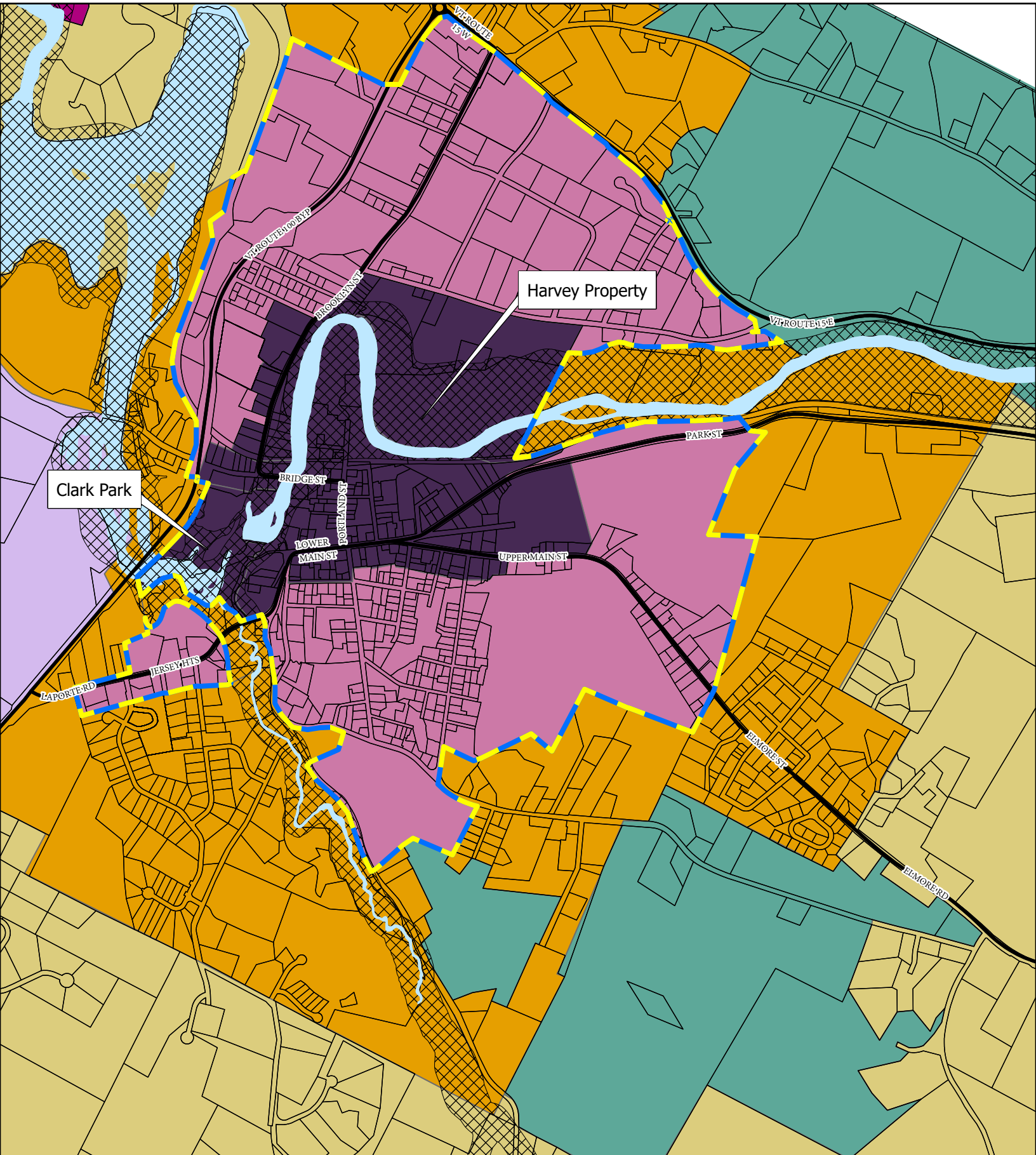


- Enterprise
- Village Area
- Planned Growth Area
- Village Center
- Rural Ag and Forestry
- Downtown Center
- Resource Based Recreation
- Parcels
- Rural Conservation
- Flood Overlay
- Rural General
- Surface Water
- Special Use
- Tier 1B Opt-In
- Transition Infill

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DRAFT Morrisville Future Land Use

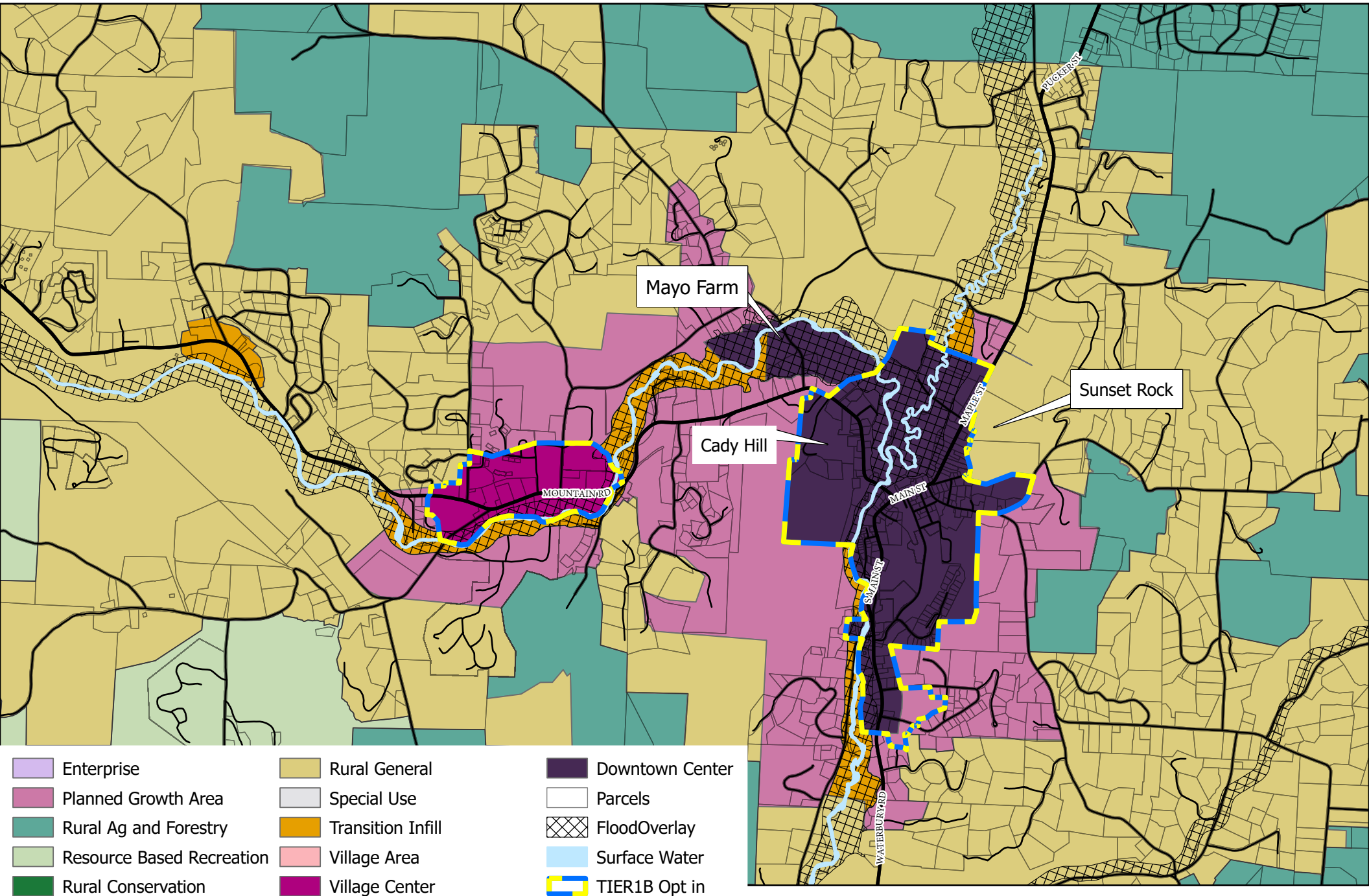


| | | | |
|---------------------------|--------------------|-----------------|----------------|
| Enterprise | Rural Conservation | Village Area | LC_Hamlets |
| Planned Growth Area | Rural General | Village Center | Surface Water |
| Rural Ag and Forestry | Special Use | Downtown Center | Tier 1B Opt-In |
| Resource Based Recreation | Transition Infill | LC_FloodOverlay | |

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0 1,000 2,000 Feet

DRAFT Stowe Future Land Use



Mayo Farm

Sunset Rock

Cady Hill

MOUNTAIN RD

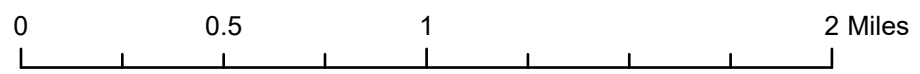
MAIN ST

MAPLE ST

WATERBURY RD

TUCKER ST

- | | | |
|---------------------------|-------------------|-----------------|
| Enterprise | Rural General | Downtown Center |
| Planned Growth Area | Special Use | Parcels |
| Rural Ag and Forestry | Transition Infill | Flood Overlay |
| Resource Based Recreation | Village Area | Surface Water |
| Rural Conservation | Village Center | TIER1B Opt in |



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