



State of Vermont
Land Use Review Board
10 Baldwin Street
Montpelier, VT 05633-3201
<https://act250.vermont.gov/>
SENT VIA EMAIL ONLY

March 23, 2026

Lamoille County Planning Commission
Attn: R. Tasha Wallis, Executive Director, tasha@lcpvt.org

Re: Lamoille County Planning Commission Preapplication Response

Dear Tasha:

The Land Use Review Board has completed its preapplication review of the Lamoille County Planning Commission's (LCPC) Preapplication that was deemed complete on January 21, 2026. A meeting occurred on February 10, 2026. Separately, the Board requested comments from our state partners and the public. Copies of those comments can be found on the database:

<https://anrweb.vt.gov/ANR/Act250/RPDetail.aspx?AppNum=RPC05-0001>

The Board's preapplication review does not encompass or reflect its position with respect to comments received. The comments received are provided for LCPC's information and consideration for potential revisions to its draft plan or Tier 1B requests, as it may elect. When the plan is finalized and submitted for Board approval, the Board will consider "objector" comments, if any, during the adopted plan review process.

I. BOARD REVIEW

The purpose of the preapplication process is for the Board to: (1) coordinate comment on the LCPC's draft regional plan from all interested agencies and entities, (2) provide a preliminary assessment as to whether the draft regional plan is in conformance with 24 V.S.A. §§ 4302, 4348a, 5803, and 5804. 24 V.S.A § 4348(b), (3) provide a preliminary assessment as to whether the draft regional plan is consistent with the purposes 24 V.S.A. § 4347. 24 V.S.A. § 4348(h)(4)(B), and (4) to provide preliminary assessment as to whether any Tier 1B status request meets the requirements of 10 V.S.A. § 6033(c) and 24 V.S.A. § 4348a(a)(12)(A)-(C).

This preapplication response addresses the statutory standards and identifies areas where the: (1) the draft plan appears to comply, (2) the draft plan appears deficient and likely needs revision to comply, or (3) additional information will likely be necessary for the Board to make a determination of compliance. If the LCPC disagrees with a

negative assessment, the Board will need additional information about why the LCPC believes the statutory standard is met. Such additional information should be included with the adopted regional plan application. This response includes optional recommendations of the Board that the LCPC may choose to address within the adopted regional plan.

This preapplication response is advisory only and does not guarantee an affirmative determination when the adopted plan or Tier 1B status request is submitted pursuant to Section 1.200 of the Board's *Regional Planning Commission Application Guidelines*.

A. Further the State Planning Goals 24 V.S.A. § 4302

The Board has reviewed the draft regional plan to determine if the plan furthers the goals of 24 V.S.A. § 4302.

1. Conformance with 24 V.S.A. § 4302(a)

Board Response: The draft plan reflects appropriate development of land in a manner to promote public health, safety, welfare, comfort, and prosperity. It posits the importance of mitigating property tax burden on agricultural, forested, and other open lands. The plan encourages appropriate architectural design and renewable energy resource development. It addresses traffic congestion, encourages growth in communities to create an optimum natural, built, and cultural environment, and plans for the prevention of negative impacts of growth.

The draft regional plan appears to adequately consider and reflect the general purposes of 24 V.S.A. § 4302(a).

Advisory Recommendation:

- Plan would benefit from restructuring to place actions and policies at the end of chapters after providing background and explaining terms used.

2. Conformance with 24 V.S.A. § 4302(b)

Board Response: The Regional Plan emphasizes meaningful community engagement and outlines a comprehensive planning process that encourages citizen participation at all levels. It establishes a policy framework and implementation strategy to guide municipal, regional, and state decision-making, aligning with state priorities while reflecting regional and municipal conditions. Each chapter assesses the environmental, economic, and social impacts of development, directing growth to designated areas and protecting natural resources. The Plan particularly addresses flood resilience, advocating for development outside floodplains or elevation when necessary. It

promotes collaboration among municipalities through regional partnerships, shared services, and coordinated planning on issues like flood mitigation and transportation.

Page numbers 10-12 (Introduction-Our Planning Process), 231-286 (Land Use), 312-346 (Working Lands), 347-373 (Water Resources), 374-409 (Flood Resilience).

The draft plan appears to reflect furtherance of the goals listed in 24 V.S.A. § 4302(b).

Advisory Recommendation:

- Improve linkage to public input as a foundation for the plan.

3. Conformance with 24 V.S.A. § 4302(c)

The draft regional plan must further the fifteen goals of 24 V.S.A. 4302(c).

Goal 1:

The first goal is to plan development that maintains the historic settlement pattern of compact village and urban centers separated by rural countryside. 24 V.S.A. § 4302(c)(1).

Board Response: The Land Use chapter of the Regional Plan, directs residential development to downtown and village centers, planned growth areas, and village areas. It encourages growth in both legacy and new designated areas, promoting investment in public infrastructure near these centers. The Plan aims to maintain historic settlement patterns by guiding growth into center and enterprise areas outside floodplains, protecting natural landscapes, and promoting sustainability. Key policies include directing infrastructure investments to support these objectives, ensuring development aligns with environmental limitations, and encouraging higher densities in center areas while discouraging strip development along transportation corridors.

Page numbers 35-44 (Economic Development Strategy), 231-286 (Land Use), 374-409 (Flood Resilience).

The draft plan appears to be consistent with Goal 1.

Goal 2:

The second goal requires the plan “[t]o provide a strong and diverse economy that provides satisfying and rewarding job opportunities and that maintains high environmental standards, and to expand economic opportunities in areas with high unemployment or low per capita incomes.” 24 V.S.A. § 4302(c)(2).

Board Response: The Economic Development Strategy in the Regional Plan promotes a diverse economy and enhances local employment opportunities by supporting existing employment centers and business growth in designated areas. It

emphasizes technological innovation, vital infrastructure investment, and sustainable tourism development. Key policies encourage business expansion, economic diversification, and support for recreation and tourism to enhance quality of life. The Plan aligns with the Comprehensive Economic Development Strategy to build economic resilience, cultivate business growth, improve infrastructure, develop the workforce, and support disaster recovery. It also advocates for value-added agriculture and business incubation to foster entrepreneurship.

Page numbers: 35-44 (Economic Development Strategy), 231-286 (Land Use).

The draft plan appears to be consistent with Goal 2.

Goal 3:

The third goal requires the plan to “[t]o broaden access to educational and vocational training opportunities sufficient to ensure the full realization of the abilities of all Vermonters.” 24 V.S.A. § 4302(c)(3).

Board Response: The education section in the Public Facilities Chapter of the Regional Plan emphasizes broadening access to educational and vocational training opportunities, essential for Lamoille County's economy. It advocates for community investments in education, culture, recreation, healthcare, and municipal services to attract economic development. Policies support creating a safe, inclusive region with good schools and enriching opportunities for all ages, encouraging public facilities in downtown and village centers. The completion of high-speed fiber technology by Lamoille Fibernet Communications Union District enhances educational access, particularly in rural areas. The Plan promotes robust, reliable, and affordable broadband access to support educational services and meet workforce needs.

Page numbers: 217-220 (Telecommunications and Broadband Strategy), 452-473 (Public Facilities).

The draft plan appears to be consistent with Goal 3.

Goal 4:

The fourth goal requires the plan “[t]o provide for safe, convenient, economic, and energy efficient transportation systems that respect the integrity of the natural environment, including public transit options and paths for pedestrians and bicyclers.” 24 V.S.A. § 4302(c)(4). As well as “[h]ighways, air, rail, and other means of transportation should be mutually supportive, balanced, and integrated.” 24 V.S.A. § 4302(c)(4)(A).

Board Response: The Transportation chapter of the Regional Plan promotes a safe, convenient, economic, and energy-efficient transportation system, emphasizing public transit, micro-transit services, and enhanced bike/pedestrian infrastructure. It addresses transportation energy burdens and prioritizes safety, mobility, and energy efficiency. Key strategies include addressing safety issues, providing transportation alternatives to

reduce single-occupancy vehicle travel, and promoting electric vehicle incentives and infrastructure. The chapter supports improving road safety, enhancing public transit, expanding bike/pedestrian networks, and fostering multi-modal opportunities, including air and rail travel, to meet regional needs and reduce energy demand.

Page numbers:116-154 (Transportation).

The draft plan appears to be consistent with Goal 4.

Goal 5:

The fifth goal requires the plan “[t]o identify, protect, and preserve important natural and historic features of the Vermont landscape, including:

- (A) significant natural and fragile areas;
- (B) outstanding water resources, including lakes, rivers, aquifers, shorelands, and wetlands;
- (C) significant scenic roads, waterways, and views;
- (D) important historic structures, sites, or districts, archaeological sites, and archaeologically sensitive areas.”

24 V.S.A. § 4302(c)(5).

Board Response: The Regional Plan emphasizes the identification and protection of natural areas, water resources, and scenic and historic resources, as outlined in the History, Working Lands, and Water Resources chapters. Key strategies include educating new residents about the region's land ethic, promoting sound stewardship of private and public lands, and enhancing wildlife resources by preventing habitat fragmentation. The Plan highlights the importance of Lamoille County's high-quality water resources for recreation, ecology, and the economy, advocating for the restoration and protection of riparian areas, wetlands, and floodplains to improve flood resilience and support diverse habitats. It also stresses coordinated local and regional efforts to monitor and protect water quality, conserve farm and forestland, protect significant ridgelines, and ensure that development does not impair recreational opportunities or historical and scenic values.

Page numbers: 45-50 (History, Section 2), 312-346 (Working Lands), 347-373 (Water Resources).

The draft plan appears to be consistent with Goal 5.

Goal 6:

The sixth goal requires the plan “[t]o maintain and improve the quality of air, water, wildlife, forests, and other land resources.

- (A) Vermont's air, water, wildlife, mineral, and land resources should be planned for use and development according to the principles set forth in 10 V.S.A. § 6086(a).
- (B) Vermont's water quality should be maintained and improved according to the policies and actions developed in the basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253.
- (C) Vermont's forestlands should be managed so as to maintain and improve forest blocks and habitat connectors.

24 V.S.A. § 4302(c)(6).

Board Response: Goal 6 of the Regional Plan focuses on maintaining and improving the quality of air, water, wildlife, forests, and other land resources, as detailed in the Working Lands and Water Resources chapters. Strategies include educating private property owners as stewards of the landscape, promoting sound management of public lands, and protecting diverse wildlife habitats. The Plan emphasizes the importance of high-quality water resources for recreation, ecology, and the economy, advocating for the restoration and protection of riparian areas, wetlands, and floodplains to enhance flood resilience and support biodiversity. It supports local conservation efforts, protection of significant ridgelines, and discourages habitat fragmentation. Additionally, the Plan calls for coordinated efforts to monitor water quality, implement wastewater treatment, and use green stormwater infrastructure to meet Vermont Water Quality Standards and reduce pollution.

Page numbers: 312-346 (Working Lands), 347-373 (Water Resources).

The draft plan appears to be consistent with Goal 6.

Advisory Recommendation:

- Reference the applicable basin plan, its status, the applicable water quality policies and actions therein, and how the Lamoille RPC Plan aligns with it.

Goal 7:

The seventh goal requires the plan “[t]o make efficient use of energy, provide for the development of renewable energy resources, and reduce emissions of greenhouse gases.

- (A) General strategies for achieving these goals include increasing the energy efficiency of new and existing buildings; identifying areas suitable for renewable energy generation; encouraging the use and development of renewable or lower emission energy sources for electricity, heat, and transportation; and reducing transportation energy demand and single occupancy vehicle use.

(B) Specific strategies and recommendations for achieving these goals are identified in the State energy plans prepared under 30 V.S.A. §§ 202 and 202b.”

24 V.S.A. § 4302(c)(7).

Board Response: Goal 7 of the Regional Plan is extensively addressed in the Enhanced Energy Plan, which was updated in 2024 to meet Act 174 standards and received compliance from the Vermont Public Service Department. The 2026 amendment did not update the Energy chapter, as significant revisions were made in 2024, except for land use references per Act 181. The Enhanced Energy Plan aligns with greenhouse gas reduction targets from the Global Warming Solutions Act and the Vermont Comprehensive Energy Plan. Key strategies include promoting energy efficiency, supporting renewable energy development, and encouraging the use of electric vehicles. The Plan also emphasizes making renewable energy affordable, upgrading utility grids, and improving bicycle and pedestrian networks, while ensuring transportation projects align with regional land use goals.

Page numbers:155-215 (Enhanced Energy Plan).

The draft plan appears to be consistent with Goal 7.

Goal 8

The eighth goal requires the plan “[t]o maintain and enhance recreational opportunities for Vermont residents and visitors.

- (A) Growth should not significantly diminish the value and availability of outdoor recreational activities.
- (B) Public access to noncommercial outdoor recreational opportunities, such as lakes and hiking trails, should be identified, provided, and protected wherever appropriate.”

24 V.S.A. § 4302(c)(8).

Board Response: Goal 8 of the Regional Plan, addressed in the Recreation chapter, emphasizes maintaining and enhancing recreational amenities in Lamoille County, a key tourism destination. The Plan integrates recreation into daily life by promoting sidewalks, trails, and bike lanes, contributing to Vermont's low obesity rates and overall health. It highlights the importance of collaboration among public landowners, private landowners, and user groups to support a coordinated recreation network, such as the Lamoille Valley Rail Trail. The Plan underscores the economic significance of recreation, including skiing, hunting, and mountain biking, and encourages sound land management to adapt to changing trends and climate. Key policies advocate for inclusive recreational facilities, integrating trails in new developments, and ensuring the vitality of the tourism industry while addressing climate change impacts.

Page numbers: 287-311 (Recreation chapter), 116-154 (Transportation chapter).

The draft plan appears to be consistent with Goal 8.

Goal 9:

The ninth goal requires the plan “[t]o encourage and strengthen agricultural and forest industries.

- (A) Strategies to protect long-term viability of agricultural and forestlands should be encouraged and should include maintaining low overall density.
- (B) The manufacture and marketing of value-added agricultural and forest products should be encouraged.
- (C) The use of locally-grown food products should be encouraged.
- (D) Sound forest and agricultural management practices should be encouraged.
- (E) Public investment should be planned so as to minimize development pressure on agricultural and forest land.

24 V.S.A. § 4302(c)(9).

Board Response: Goal 9 of the Regional Plan, detailed in the Working Lands chapter, supports the agricultural and forestry industries as vital components of Lamoille County's economy. The Plan encourages the protection and viability of these resources, emphasizing the importance of diverse agricultural and forest-based enterprises, including agritourism. It highlights the role of private property owners as stewards of the landscape and the need for education to promote sound environmental stewardship. Public lands also contribute to the working landscape, with policies supporting diverse public uses and conservation efforts. The Plan advocates for the diversification of agricultural and forest products, development of supporting industries, and increased access to local products. It recognizes the stewardship role of private property owners and supports state and local efforts to ensure the sustainability of these industries, encouraging public use of state-owned lands for various activities.

Page numbers: 312-346 (Working Lands).

The draft plan appears to be consistent with Goal 9.

Goal 10:

The tenth goal requires the plan “[t]o provide for the wise and efficient use of Vermont's natural resources and to facilitate the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetic qualities of the area.” 24 V.S.A. § 4302(c)(10).

Board Response:

The plan introduction includes a discussion of the county's earth resources, particularly abundant gravel and sand deposits, and encourages the wise use of these resources

with thoughtful remediation and reuse of sand and gravel pit sites. Lamoille County has a tradition of mining and quarrying, with past resources including talc, soapstone, and asbestos. Currently, gravel is the primary resource extracted, with the Lamoille River basin providing rich deposits. Gravel plays a crucial role in the region's economy, supporting construction, road building, and septic systems, while also providing jobs and tax revenue. Both municipally and privately owned gravel pits contribute economically, though development pressures threaten resource availability. Redevelopment plans for exhausted pits could address regional development needs and offset restoration costs.

Page numbers: 231-286 (Land Use), see (earth resources), 312-346 (Working Lands), 347-373 (Water Resources), Earth Resources: 39-40 (Introduction), 43-44 (Earth Resources), 248 (Action items), and 272 (further discussion).

The draft plan appears to be consistent with Goal 10.

Requested Revision:

- **Revise the Goal 10 section of the LCPC checklist to address the use of earth resources, remediation of extraction sites, and reuse of former extraction sites.**

Goal 11:

The eleventh goal requires the plan “[t]o ensure the availability of safe and affordable housing for all Vermonters.

- (A) Housing should be encouraged to meet the needs of a diversity of social and income groups in each Vermont community, particularly for those citizens of low and moderate income, and consistent with housing targets provided for in subdivision 4348a(a)(9) of this title.
- (B) New and rehabilitated housing should be safe, sanitary, located conveniently to employment and commercial centers, and coordinated with the provision of necessary public facilities and utilities.
- (C) Sites for multifamily and manufactured housing should be readily available in locations similar to those generally used for single-family dwellings.
- (D) Accessory dwelling units (ADU) within or attached to single-family residences that provide affordable housing in close proximity to cost-effective care and supervision for relatives, elders, or persons who have a disability should be allowed.”

24 V.S.A. § 4302(c)(11).

Board Response: Goal 11 of the Regional Plan, addressed in the Housing chapter, focuses on ensuring safe and affordable housing for all Vermonters. The chapter, amended per Acts 181 and 47, includes housing targets based on population

distribution to address regional needs. Strategies emphasize providing diverse housing options, including "missing middle" housing and ADUs, and consider the costs of housing plus transportation by encouraging development near village and downtown centers. The Plan highlights the importance of expanding housing in safer areas outside floodplains and promoting "Healthy Homes" by ensuring housing is safe and supports overall wellness. Policies support regional solutions for affordable housing, encourage clustering for multi-family and mixed-use developments, and assist municipalities in infrastructure planning to support housing growth, particularly in designated areas.

Page numbers:70-115 (Housing Chapter).

The draft plan appears to be consistent with Goal 11.

Goal 12:

The twelfth goal requires the draft plan:

To plan for, finance, and provide an efficient system of public facilities and services to meet future needs.

(A) Public facilities and services should include fire and police protection, emergency medical services, schools, water supply, and sewage and solid waste disposal.

(B) The rate of growth should not exceed the ability of the community and the area to provide facilities and services.

24 V.S.A. § 4302(c)(12).

Board Response: Goal 12 of the Regional Plan, detailed in the Public Facilities chapter, focuses on enhancing public facilities and services, such as water and sewer, in designated growth areas. The chapter encourages reusing abandoned or under-utilized facilities and emphasizes community investments in education, culture, recreation, healthcare, and municipal services to attract economic development. It highlights the importance of maintaining quality of life to retain residents and stimulate local economies. Key policies promote developing a safe, inclusive region with good schools, ensuring adequate public facilities in downtowns and village centers, and providing materials and needle collection facilities throughout the region.

Page numbers: 231-286 (Land Use), 432-451 (Culture and Community), 452-473 (Public Facilities). Page 436 notes health equity with under-represented communities.

The draft plan appears to be consistent with Goal 12.

Goal 13:

The thirteenth goal requires the plan "[t]o ensure the availability of safe and affordable child care and to integrate child care issues into the planning process, including child care financing, infrastructure, business assistance for child care providers, and child care work force development." 24 V.S.A. § 4302(c)(13).

Board Response: Goal 13 of the Regional Plan, found in the Culture and Community chapter, focuses on ensuring safe and affordable childcare. It emphasizes creating environments where youth can grow with healthy behaviors like physical activity and balanced nutrition. The Plan supports high-quality, affordable childcare providers and facilities across Lamoille County to meet the needs of families and employers, fostering an enriching environment for children and youth.

Page numbers: 432-451 (Culture and Community). Page 434 details childcare needs and action items.

The draft plan appears to be consistent with Goal 13.

Goal 14:

The fourteenth goal requires the plan to encourage flood resilient communities. 24 V.S.A. § 4302(c)(14).

Board Response: Goal 14 of the Regional Plan, detailed in the Flood Resilience chapter, focuses on creating flood-resilient communities by updating policies to support infrastructure upgrades, guiding development outside floodplains, and promoting resource sharing. The Plan emphasizes anticipating and preparing for floods, concentrating development in safe areas, and protecting floodplains and upland forests to mitigate flood impacts. It advocates for adequately designed transportation infrastructure to withstand floods and encourages local preparedness through emergency planning and training. Key policies discourage new development in flood-prone areas, protect natural flood attenuation areas, and ensure a coordinated regional response to flooding emergencies.

Page numbers: 374-409 (Flood Resilience).

The draft plan appears to be consistent with Goal 14.

Goal 15:

The fifteenth goal requires the plan “[t]o equitably distribute environmental benefits and burdens as described in 3 V.S.A. chapter 72.” The referenced chapter is titled: “Environmental Justice.” The State of Vermont has explained:

It is further the policy of the State of Vermont to provide the opportunity for the meaningful participation of all individuals, with particular attention to environmental justice focus populations, in the development, implementation, or enforcement of any law, regulation, or policy.

3 V.S.A. § 6003.

“Meaningful participation” means that all individuals have the opportunity to participate in energy, climate change, and environmental decision making.

Examples include needs assessments, planning, implementation, permitting, compliance and enforcement, and evaluation. Meaningful participation also integrates diverse knowledge systems, histories, traditions, languages, and cultures of Indigenous communities in decision-making processes. It requires that communities are enabled and administratively assisted to participate fully through education and training. Meaningful participation requires the State to operate in a transparent manner with regard to opportunities for community input and also encourages the development of environmental, energy, and climate change stewardship.

3 V.S.A. § 6002(6).

Board Response:

Page numbers: 7-9 (Introduction – Health Equity and Environmental Justice; Equity Analysis), 70-76 (Housing Strategy), Energy (162-168), 141-142 (Transportation), and throughout the Plan.

The draft plan appears to be inconsistent with Goal 15.

Required Revisions: 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. The equity analysis in the introduction is focused on flooding impacts, to the exclusion of other environmental benefits and burdens. Health equity is discussed in the introduction but in a very general way that doesn't explore potential disparities for different segments of the community. The plan also recommends consideration of "equity" in siting of renewable energy facilities and electric vehicle charging infrastructure. However, the plan doesn't expand beyond these limited and rather generic recommendations. The plan should be bolstered to better address the statutory goal. It's also unclear if special outreach efforts were made to environmental justice focus populations during the development of the plan. Detail the public engagement process and the populations engaged in the content of the plan to meet statutory requirements.

Advisory Recommendations:

- The Brownfields section on page 111 is an opportunity to discuss how Brownfield remediation can address injustices historically perpetuated on marginalized populations.
- Action items on page 239 is an opportunity to link EJ to flood resiliency efforts.
- Page 303, Perhaps speak to health and recreation access in terms of EJ somewhere in the Sense of Place Chapter?

- Page 398 under acquiring or protecting land in flood-prone locations, speak to EJ impacts to community of removing housing during housing crisis.
- Page 433, identify who the underrepresented groups are.

B. Consistency with the Purposes of a Regional Plan 24 V.S.A. § 4347

As part of the Board's review of the draft regional plan, the Board must make a determination as to whether the plan is consistent with the purposes of the regional plan found in 24 V.S.A. § 4347. 24 V.S.A. § 4348(h)(4)(B). Section 4347 states:

A regional plan shall be made with the general purpose of guiding and accomplishing a coordinated, efficient, equitable, and economic development of the region that will, in accordance with the present and future needs and resources, best promote the health, safety, order, convenience, prosperity, and welfare of current and future inhabitants as well as efficiency and economy in the process of development. This general purpose includes recommending a distribution of population and of the uses of the land for urbanization, trade, industry, habitation, recreation, agriculture, forestry, and other uses as will tend to:

- (1) create conditions favorable to transportation, health, safety, civic activities, and educational and cultural opportunities;
- (2) reduce the wastes of financial, energy, and human resources that result from either excessive congestion or excessive scattering of population;
- (3) promote an efficient and economic utilization of drainage, energy, sanitary, and other facilities and resources;
- (4) promote the conservation of the supply of food, water, energy, and minerals;
- (5) promote the production of food and fiber resources and the reasonable use of mineral, water, and renewable energy resources;
- (6) promote the development of housing suitable to the needs of the region and its communities; and
- (7) help communities equitably build resilience to address the effects of climate change through mitigation and adaptation consistent with the Vermont Climate Action Plan adopted pursuant to 10 V.S.A. § 592 and 3 V.S.A. Chapter 72.

Board Response: As the draft plan addresses the separate goals enumerated in Part A of this preapplication response (above) and through the various required elements as enumerated in Part D (below), the draft plan as a whole is consistent with these 24 V.S.A. § 4347 purposes. The framework for the plan is outlined in the Executive Summary and actions are provided detailing how the plan will be implemented.

Page numbers: 1-10 (Introduction), 19-27 (Implementation Plan). Page 449 provides information on libraries and cultural facilities.

The draft plan appears to be consistent with the purposes of 24 V.S.A. § 4347.

C. Conformance with Outreach Requirements of 24 V.S.A. § 4348(a)

As part of the development of the regional plan,

... regional planning commissions shall solicit the participation of each of their member municipalities, local citizens, and organizations by holding informal working sessions that suit the needs of local people. The purpose of these working sessions is to allow for meaningful participation as defined in 3 V.S.A. § 6002, provide consistent information about new statutory requirements related to the regional plan, explain the reasons for new requirements, and gather information to be used in the development of the regional plan and future land use element.

24 V.S.A. § 4348(a).

Board Response: LCPC's meaningful community engagement process is outlined on pages 7-13 of the 2026 Regional Plan Amendment and involved extensive outreach from March to December 2025, with additional efforts planned for early 2026. They conducted a survey with 278 responses from all 10 towns, distributed flyers, and engaged communities through online forums and local meetings. The Commission held public forums, municipal trainings, and collaborated with other organizations to support flood-affected areas, emphasizing assistance for low income and marginalized communities. They also coordinated with health and racial equity partners to ensure diverse input and compliance with statutory requirements.

LCPC's meaningful community engagement process outlined on pages 7-13.

The draft regional plan appears to have been developed with the participation of its member municipalities, and the RPC appears to have provided for meaningful participation to communities throughout the region.

D. Conformance with 24 V.S.A. § 4348a

The Board has assessed the draft regional plan as to whether it appears to conform with the required elements of 24 V.S.A. § 4348a(a). The subsections below match the numbered subsections of 24 V.S.A. § 4348a(a). Subsection 6 was repealed by the legislature but is listed as a placeholder below and is intentionally left blank.

1. Statement of Basic Policies

A regional plan must contain: "[a] statement of basic policies of the region to guide the future growth and development of land and of public services and facilities, and to protect the environment." 24 V.S.A. § 4348a(a)(1).

Board Response: The Regional Plan outlines policies to guide future growth, development, public services, facilities, and environmental protection. The introduction provides an overview of key objectives and an implementation plan. The Land Use chapter emphasizes compact growth areas, while public facilities and services have dedicated policies. Environmental protection is extensively covered in Section 4, with policies supporting the preservation of rivers, streams, wetlands, forests, fisheries, wildlife, and other natural resources across the Recreation, Water Resources, Working Lands, and Flood Resiliency chapters.

Page numbers: 2-10; 231-249 (Land Use Strategy), 287-294 (Recreation Strategy), 312-316 (Working Lands Strategy), 347-352 (Water Resources Strategy), 374-381 (Flood Resilience Strategy).

The draft regional plan appears to meet this requirement.

2. Natural Resources and Working Lands

A regional plan must contain:

A natural resources and working lands element, which shall consist of a map or maps and policies, based on ecosystem function, consistent with Vermont Conservation Design, support compact centers surrounded by rural and working lands, and that:

- (A) Indicates those areas of significant natural resources, including existing and proposed for forests, wetlands, vernal pools, rare and irreplaceable natural areas, floodplains, river corridors, recreation, agriculture using the agricultural lands identification process established in 6 V.S.A. § 8, residence, commerce, industry, public, and semipublic uses, open spaces, areas reserved for flood plain, forest blocks, habitat connectors, recreation areas and recreational trails, and areas identified by the State, regional planning commissions, or municipalities that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes.
- (B) Indicates those areas that have the potential to sustain agriculture and recommendations for maintaining them that may include transfer of development rights, acquisition of development rights, or farmer assistance programs.
- (C) Indicates those areas that are important as forest blocks and habitat connectors and plans for land development in those areas to minimize forest fragmentation and promote the health, viability, and ecological function of forests. A plan may include specific policies to encourage the active management of those areas for wildlife habitat, water quality,

timber production, recreation, or other values or functions identified by the regional planning commission.

(D) Encourages preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

(E) Encourages protection and improvement of the quality of waters of the State to be used in the development and furtherance of the applicable basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253.

24 V.S.A. § 4348a(a)(2).

Board Response: Lamoille County meets Vermont's conservation goals with 86.7% of its land in conservation or Current Use, aiming for 30% conserved land by 2030 and 50% by 2050. The Regional Plan's Section 4 emphasizes protecting natural resources and working lands, with policies supporting ecological functions for wildlife habitat, water quality, and recreation. The Working Lands chapter highlights the importance of diverse agricultural and forest enterprises, conservation efforts, and infrastructure support for agriculture and forestry. The Water Resources chapter focuses on protecting water quality through strategies like restoring riparian areas and protecting wetlands, while the Flood Resiliency chapter emphasizes conserving floodplains and river corridors to benefit natural resources and the community.

Page numbers: 286 (Land Use chapter, see Conserved Lands map), 312-316 (Working Lands Strategy), 347-352 (Water Resources Strategy), 374-381 (Flood Resilience Strategy).

The draft regional plan appears to meet this requirement.

Advisory Recommendations:

- Page 367, clarify if the Seymour River and Phase 2 are one in the same.
- Page 381, consider having the plan speak to the Clean Water Service Provider role of LCPC. Also, note flood buyouts.
- Map on page 395 is not legible.
- Hunting and fishing are noted on page 314 as an important recreation component but not mentioned as way of land stewardship.
- Page 319 states \$84,319 and this should be clarified as per capita or average per farm etc.

3. Energy

The draft regional plan must contain:

An energy element, including an analysis of resources, needs, scarcities, costs, and problems within the region across all energy sectors, including electric,

thermal, and transportation; a statement of policy on the conservation and efficient use of energy and the development and siting of renewable energy resources; a statement of policy on patterns and densities of land use likely to result in conservation of energy; and an identification of potential areas for the development and siting of renewable energy resources and areas that are unsuitable for siting those resources or particular categories or sizes of those resources.

24 V.S.A. § 4348a(3).

Board Response: The chapter emphasizes energy efficiency and conservation, promoting growth in walkable Village/Downtown Centers while discouraging strip development. It addresses energy equity and justice, highlighting weatherization as crucial for reducing energy burdens in vulnerable communities. The chapter advocates for alternative transit, EV charging, and developing walkable and bikeable communities to reduce transportation energy burdens and emissions. It analyzes energy use across sectors, setting targets for reducing energy use and emissions and increasing renewable energy generation to meet state goals. Limitations in the regional electric grid are noted, and the chapter concludes with an analysis of renewable energy potential, identifying suitable and unsuitable areas for development, with maps provided.

Page numbers: 155-215 (Energy Chapter).

The draft regional plan appears to meet this requirement.

Advisory Recommendations:

- Page 159, explain why the Emerald Ash Borer is incorporated into this chapter.
- Page 162 notes forest fragmentation in the energy chapter and perhaps best belongs in natural resources.
- Page 166, note how the energy burden for the county compares to the State's.
- Page 198, third paragraph explain more directly that can consume power in proximity to generation but not to export. Grid capacity.
- Page 209 at the top appears to repeat information from page 207.

4. Transportation

A regional plan must include the following:

A transportation element consisting of a statement of present and prospective transportation and circulation facilities, and a map showing existing and proposed highways, including limited access highways, and streets by type and character of improvement, and where pertinent, anticipated points of congestion, parking facilities, transit routes, terminals, bicycle paths and trails, scenic roads, airports, railroads and port facilities, and other similar facilities or uses, and

recommendations to meet future needs for such facilities, with indications of priorities of need, costs, and method of financing.

24 V.S.A. § 4348a(a)(4).

Board Response: The chapter outlines goals, policies, and actions to support safe, accessible, regional multi-modal transportation, including rail and air travel, while enhancing scenic and environmental resources. It provides a background on the region's highway system, which serves both as a freight network and "Main Street" in village areas, highlighting scenic routes like the Smugglers' Notch Scenic Highway. The chapter discusses Transportation Demand Management and Multi-Modal Connectivity to create a comprehensive system for cars, bicycles, pedestrians, rail, aviation, and public transit. It emphasizes alternative transportation modes, such as ride-sharing and Rural Community Transit, and highlights bike and pedestrian networks like the Stowe Recreation Path and Lamoille Valley Rail Trail for their economic and health benefits. Tools like Healthy Community Design, Traffic Calming, and Streetscaping are also discussed to improve safety and functionality. The chapter concludes with major route identifications and highway classifications, with maps provided.

Page numbers: 116-154 (Transportation chapter).

The draft regional plan appears to meet this requirement.

Advisory Recommendations:

- Page 115 lists the transportation strategy. Where does the prioritization come from? Are these priorities identified by the community, national models. etc. ?
- Page 117, Promote an energy efficient transportation network does not mention if VTrans has been engaged in these efforts.
- Page 122, need to work with transit providers too to identify their needs and capacity.
- Page 123, why not lead with "here are the priorities identified in the regional TDM plan" rather than bury it in the transportation chapter. Why did you do the study? What were the significant findings? How is it being implemented? Give credit for the pre-work for the plan.
- Page 125, there is a typo in the description for Class 1 roads in the table.
- Page 127 notes bridge sufficiency. Consider adding in bridge conditions.
- Page 127-128 notes that travel time to work has increased yet 7% more people work from home. Perhaps skewed by people working from home when they have to report in or change in census counting from less than 5 to less than 10 min? Explain if possible.

- Page 140 Perhaps lead chapter with the Transportation-Land Use Connection and put the policies at the end of the chapter once the assets and strategies are explained (such as TDM)?
- Embedded maps would help the chapter explain scenic highway locations. Maps starting on page 148 should each have their own page and can be hard to read.
- Transportation Resources Map - separate out as there are too many items on it and it makes it hard to read.
- The [AOT Act 181 Transportation Support Study](#), submitted to the legislature in December 2025, includes recommendations and opportunities to strengthen the role of regional planning commissions in several areas relevant to this plan element. To address the potentially significant traffic impacts resulting from development in Tier 1A and 1B areas (that will no longer be subject to Act 250 review), consider revising the plan to: (1) add detail about how to address the anticipated need for increased transportation infrastructure planning, (2) support alternative new or leveraged local or state regulatory review processes to address mitigation of traffic from development that will no longer be subject to Act 250 review, and/or (3) incorporate policies or planned actions which align with the noted December 2025 AOT Act 181 Study.

5. Utility and Facility

The Draft Regional Plan must contain:

A utility and facility element, consisting of a map and statement of present and prospective local and regional community facilities and public utilities, whether publicly or privately owned, showing existing and proposed educational, recreational and other public sites, buildings and facilities, including public schools, State office buildings, hospitals, libraries, power generating plants and transmission lines, wireless telecommunications facilities and ancillary improvements, water supply, sewage disposal, refuse disposal, storm drainage, and other similar facilities and activities, and recommendations to meet future needs for those facilities, with indications of priority of need.

24 V.S.A. § 4348a(a)(5).

Board Response: The Telecommunications and Public Facilities chapters of the Regional Plan align with utility and facility objectives. The Telecommunications chapter highlights progress in wireline broadband and cellular coverage, noting significant gaps remain. It emphasizes the importance of universal broadband and cellular coverage for various stakeholders, including emergency responders, and includes maps of telecommunication facilities. The Public Facilities chapter outlines policies for developing safe, inclusive schools and reusing facilities, with an inventory of educational options and capacity trends. It also covers public facilities like cemeteries and waste

management, and includes maps of community facilities. Additionally, it details LCPC's role in the Section 248 process for public utility certification.

Page numbers: 216-230 (Telecommunications Chapter), 452-473 (Public Facilities).

The draft regional plan appears to meet this requirement.

Advisory Recommendations:

- Page 256, CHIP could be employed in decentralized wastewater initiatives.
- Page 471 map needs a better legend.
- Note that the county is served by 10 utilities.

6. (repealed)

7. Implementation

A draft regional plan must contain “[a] program for the implementation of the regional plan’s objectives, including a recommended investment strategy for regional facilities and services based on a capacity study of the elements in this section.” 24 V.S.A. § 4348a(a)(7).

Board Response: The Introduction of the Regional Plan includes an implementation plan summary table and action items with timeframes for each section, along with updated guiding objectives for the 2026 amendment. Key objectives focus on directing growth to compact settlements outside floodplains, protecting natural landscapes, and promoting village centers near infrastructure. The Plan encourages diverse and affordable housing, supports sustainable natural systems and recreational amenities, and aims to create welcoming, healthy communities. It emphasizes an efficient transportation system, a thriving local economy that preserves scenic character, investment in public infrastructure, collaboration for energy efficiency, and consideration of environmental impacts on underserved communities.

Page numbers: 9-10, 19-27 (Introduction) and throughout the Plan.

The draft regional plan appears to meet this requirement.

8. Compatibility with Other Plans

The draft regional plan must contain: “[a] statement indicating how the regional plan relates to development trends, needs, and plans and regional plans for adjacent municipalities and regions.” 24 V.S.A. § 4348a(a)(8).

Board Response: The Introduction to the Plan includes a compatibility statement discussing how the Plan was developed and its compatibility with adjacent regions. The needs and trends of neighboring regions are recognized by region. Compatibility statements are included throughout other sections of the plan as well.

Page numbers: 32-34 (Introduction).

The draft regional plan appears to meet this requirement.

9. Housing

The draft regional plan must include:

A housing element that identifies the regional and community-level need for housing that will result in an adequate supply of building code and energy code compliant homes where most households spend not more than 30 percent of their income on housing and not more than 15 percent on transportation. To establish housing needs, the Department of Housing and Community Development shall publish statewide and regional housing targets or ranges as part of the Statewide Housing Needs Assessment. The regional planning commission shall consult the Statewide Housing Needs Assessment; current and expected demographic data; the current location, quality, types, and cost of housing; other local studies related to housing needs; and data gathered pursuant to subsection 4382© of this title. If no such data has been gathered, the regional planning commission shall gather it. The regional planning commission's assessment shall estimate the total needed housing investments in terms of price, quality, unit size or type, and zoning district as applicable and shall disaggregate regional housing targets or ranges by municipality. The housing element shall include a set of recommended actions to satisfy the established needs.

24 V.S.A. § 4348a(a)(9).

Board Response: The chapter outlines a regional strategy for a diverse and affordable housing continuum, based on data from the U.S. Census, American Community Survey, and various housing assessments. It details policies and actions to support affordable housing development, including necessary infrastructure like water and sewer. Community-level needs are analyzed, considering demographic trends and household characteristics. Regional housing targets for 2030 and 2050 are set, with discussions on housing needs, costs, and the number of cost-burdened households. Housing targets were broken down by population. The chapter also addresses transportation costs and specific housing needs for seniors, families, children, those in poverty, the homeless, student housing, seasonal workers, and veterans.

Page numbers: 70-115 (Housing Chapter).

The draft regional plan appears to meet the housing element requirement.

Advisory Recommendations:

- P. 57 Ethnic Population graph notes that ethnic groups have continued to grow. Is this an increase in people or people identifying as more than one race? Does not address more than one race count.
- P 83 Notes that there has been a slight increase in family size for Lamoille since 2010 despite Vermont's family size continuing to decrease. Was there an undercount or is there a younger demographic? What is the household size?
- P 108 Notes that the Woodworking School in Fairfax leases a building for housing Jeffersonville and states that most students seek housing in Lamoille County. Does the school have demographic information on residency? This would strengthen this paragraph and observations.
- The chart on page 113 is hard to read.
- In the vicinity of page 115, need to state that removing housing will increase costs even though people see blight as a pressing issue it may not help address the one thing that 77% of people agree on.

10. Economic Development

The draft regional plan must include “[a]n economic development element that describes present economic conditions and the location, type, and scale of desired economic development, and identifies policies, projects, and programs necessary to foster economic growth.” 24 V.S.A. § 4348a(a)(10).

Board Response: The chapter outlines a regional strategy for a diverse and affordable housing continuum, based on data from the U.S. Census, American Community Survey, and various housing assessments. It details policies and actions to support affordable housing development, including necessary infrastructure like water and sewer. Community-level needs are analyzed, considering demographic trends and household characteristics. Regional housing targets for 2030 and 2050 are set, with discussions on housing needs, costs, and the number of cost-burdened households. The chapter also addresses transportation costs and specific housing needs for seniors, families, children, those in poverty, the homeless, student housing, seasonal workers, and veterans.

Page numbers: 35-44 (Economic Development Strategy) and throughout the Plan.

The draft regional plan appears to meet this requirement.

Advisory Recommendations:

- In the discussion of industrial and enterprise areas on page 272, it would be helpful to state if there was a regional development authority.
- Page 313, LEDC is mentioned for the first time in the Sense of Place Chapter and should be in the industry section too.

11. Flood Resilience

The draft regional plan must include:

(A) A flood resilience element that:

- (i) identifies flood hazard and fluvial erosion hazard areas, based on river corridor maps provided by the Secretary of Natural Resources pursuant to 10 V.S.A. § 1428(a) or maps recommended by the Secretary, and designates those areas to be protected, including floodplains, river corridors, land adjacent to streams, wetlands, and upland forests, to reduce the risk of flood damage to infrastructure and improved property; and
- (ii) recommends policies and strategies to protect the areas identified and designated under this subdivision (A) and to mitigate risks to public safety, critical infrastructure, historic structures, and public investments.

(B) A flood resilience element may reference an existing regional hazard mitigation plan approved under 44 C.F.R. § 201.6.

24 V.S.A. § 4348a(a)(11).

Board Response: The Flood Resiliency chapter outlines policies and actions to protect wetlands, floodplains, river corridors, and upland forests, aiming to mitigate flood impacts on critical infrastructure, reduce damages, and prevent loss of life. It discourages new development in flood-prone areas and encourages relocating structures to safer locations. The chapter discusses flooding causes, such as severe storms and climate change, and highlights the vulnerability of communities due to historic development patterns. Recommendations for flood resilience include acquiring flood-prone land, relocating structures, increasing flood storage, and adopting a watershed approach. Maps of flood hazard areas and infrastructure are included, with future growth areas identified outside floodplains in the Land Use Chapter.

Page numbers: 374-409 (Flood Resilience Strategy).

The draft plan appears to meet this requirement.

12. Future Land Use

The draft plan must include:

A future land use element...that sets forth the present and prospective location, amount, intensity, and character of such land uses in relation to the provision of necessary community facilities and services and that consists of a map delineating future land use area boundaries for the land uses in subdivisions (A)–(J) of this subdivision (12) as appropriate and any other special land use category the regional planning commission deems necessary; descriptions of

intended future land uses; and policies intended to support the implementation of the future land use element...

24 V.S.A. § 4348a(a)(12).

Board Response: The LCPC reviewed and mapped Future Land Use Category boundaries per Act 181, focusing on designated growth areas near water and sewer services to support housing growth through adaptive reuse, infill, or greenfield projects. These areas are expected to accommodate most of the region's housing targets, with 3,359 to 6,621 additional units by 2050. Due to flood risks in many Center Areas, Transition Infill Areas will also help meet housing targets. Challenges include existing Downtowns and Village Centers being flood-prone and facing infrastructure limitations. Strategic investment in infrastructure and land use tools is needed to shift development to safer areas. Transition Infill Areas in Johnson and Cambridge are identified for potential development outside floodplains. Belvidere's mapped area along Route 118 offers a rare development opportunity not hindered by steep slopes or conservation protections. Additionally, the Asbestos Mine in Eden required unique mapping due to its distinct context. Flood Hazard Areas and River Corridors are mapped as overlays, consistent with surrounding land use categories.

Page numbers: 231-286 (Land Use Chapter).

The draft plan appears to meet this requirement.

Advisory Recommendations:

- Page 234, Prime ag mitigation is noted in center areas as well as transportation but these items are not listed in other future land use areas.
- Page 266, restructure Villages and Downtown designations as Downtown Board is not Community Investment Board.
- Page 268 explain new Tiers and Steps instead of legacy designations. Same on page 282.
- Page 278 details different types of zoning. This seems unusual for a regional plan. Could this information be provided by reference instead or in an appendices?
- Page 278 notes overlay district and viewsheds. Clarify if these are scenic resources.
- Page 285 the map is not readable. Page 286 the hash for parcels in current use is hard to read.

(A) Downtown Centers and Village Centers

The FLU map contains downtown and village centers, which are defined as:

Downtown or village centers. These areas are the mixed-use centers bringing together community economic activity and civic assets. They include downtowns, villages, and new town centers previously designated under chapter 76A and downtowns and village centers seeking benefits under the Community Investment Program under section 5804 of this title. The downtown or village centers are the traditional and historic central business and civic centers within planned growth areas, village areas, or may stand alone. Village centers are not required to have public water, wastewater, zoning, or subdivision bylaws.

24 V.S.A. § 4348a(a)(12)(A). The reference to section 5804 appears to be a typo, as it is titled “Designated neighborhood” whereas section 5803 is titled “Designation of downtown and village centers.” For the Board’s review of downtown and village centers, section 5803 has been incorporated.

A regional planning commission may apply to the LURB for approval and designation of all centers by submitting the regional plan future land use map adopted by the regional planning commission. The regional plan future land use map shall identify downtown centers and village centers as the downtown and village areas eligible for designation as centers. The Department and State Board shall provide comments to the LURB on areas eligible for center designation as provided under this chapter.

24 V.S.A. 5403(a).

The statute directs the Board to “allow for the designation of preexisting, designated downtowns, village centers and new town centers in existence on or before December 31, 2025.” 24 V.S.A. § 5803(b). For all other areas mapped as downtown centers, the Board used the following parameters. First, whether the mapped area reflects a traditional and historic central business and civic center. *Id.* Second, whether the mapped area is consistent with the VAPDA mapping process and standards. Finally, the Board evaluated whether areas mapped as downtown or village center include development that is disconnected from a center and that lack pedestrian connections to the center via a complete street. 24 V.S.A. § 5803(c).

With the exception for preexisting, nonconforming designations approved prior to the establishment of the program under this chapter or areas included in the municipal plan for the purposes of relocating a municipality’s center for flood resiliency purposes, the areas eligible for designation benefits upon the LURB’s approval of the regional plan future land use map for designation as a Center shall not include development that is disconnected from a Center and that lacks a pedestrian connection to the Center via a complete street.

24 V.S.A. § 5803(c).

Additionally, the Community Investment Program defines a “State Designated Downtown or Village Center” or “Center” as:

...a contiguous downtown or village a portion of which is listed or eligible for listing in the national register of historic places area approved as part of the

LURB review of regional plan future land use maps, which may include an approved preexisting designated downtown, village center, or designated new town center established prior to the approval of the regional plan future land use maps.

24 V.S.A. 5801(12) *see also* 24 V.S.A. § 5803(b).

- Downtown Centers

The downtown centers depicted on the FLU Map must meet the requirements of 24 V.S.A. § 4348a(a)(12)(A). Downtown centers are required to have zoning and subdivision bylaws and public water or sewer services. 24 V.S.A. § 4348a(a)(12)(A) *see also* 24 V.S.A. § 5803(f)(3).

Board Response:

The FLU map depicts the following **DOWNTOWN CENTERS:**

- **Morristown** **Morrisville Downtown Center**
- **Stowe** **Stowe Downtown Center**

Morristown:

The proposed **Morrisville Downtown Center** is at the intersection of Main and Portland and Bridge Streets and follows the boundaries of a legacy downtown designation with a few exceptions. The downtown includes the town offices, a movie theater, restaurants, offices, shops, and residences. The legacy area was smaller than the State Register Historic District and the downtown area is proposed to be inclusive of the entire historic district with six additional parcels added that include a museum and several residences.

The proposed Morrisville Downtown Center appears to meet the statutory standards for a downtown center.

- **Advisory Recommendation:** Consider expanding the Downtown Center FLU area: on the northwest side to Route 100 (bypass portion); on the south side of the FLU to incorporate some of the neighborhood area with interconnected streets.

Stowe:

The proposed **Stowe Downtown Center** is centered on the legacy downtown area at the intersection of Main Street, Mountain Road, and Maple Street. The downtown includes the town offices, emergency services, restaurants, lodging, shops, residences, and recreation. The expansion to the south includes a legacy village area with State Register Historic District and the school. The expansion to the west and north includes recreational properties of the municipality and businesses including an indoor swimming

facility and earth extraction business. The expansion to the north and east includes a cemetery and several large lots that are mostly undeveloped. The northern lots are mostly within the flood hazard area of the Little River. With an expansive flood hazard area, the inclusion of larger lots adjacent to the legacy area may allow for expansion and infill of the downtown.

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.

- Village Centers

The village centers depicted on the FLU map must meet 24 V.S.A. § 4348a(a)(12)(A).

Board Response:

The FLU map depicts the following **VILLAGE CENTERS:**

- **Belvidere** **Belvidere Center Village Center**
- **Belvidere** **Belvidere Corners Village Center**
- **Cambridge** **Jeffersonville Village Center**
- **Cambridge** **Upper Mountain Village**
- **Cambridge** **Cambridge Village Center**
- **Elmore** **Elmore Village Center**
- **Hyde Park** **Hyde Park Village Center**
- **Hyde Park** **North Hyde Park Village Center**
- **Johnson** **Johnson Village Center**
- **Morristown** **Morristown Corners Village Center**
- **Morristown** **Morristown Cady's Falls Village Center**
- **Stowe** **Stowe Moscow Village Center**
- **Stowe** **Stowe Upper Mountain Road Village Center**
- **Stowe** **Stowe Mountain Road Crossroads Village Center**
- **Waterville** **Waterville Village Center**
- **Wolcott** **Wolcott Village Center**
- **Wolcott** **North Wolcott Village Center**

Belvidere:

The majority of Belvidere is rural agriculture or forestry with pockets of rural conservation. Rural general lines the area of Route 109 with an enterprise area around the municipal gravel pit. There is a transition area in northern Belvidere along Route 109 at the intersection of Route 118 that is not adjacent to a village center. Belvidere has two village centers proposed on Route 109:

1. **Belvidere Center Village Center** contains approximately 31 parcels including the town offices two churches, a cemetery, and a former school. While the area does not show as specifically having historic sites, the area is a historic settlement with civic, commercial, and residential structures located in relatively close proximity to Route 109 and the North Branch of the Lamoille River, including flood hazard area, which bisect it. Several parcels in the proposed village center are either entirely or partially within the river corridor.

The proposed Belvidere Center Village Center appears to meet the statutory standards for a village center.

2. **Belvidere Corners Village Center** is on the border of Belvidere and Waterville encompassing approximately 20 parcels. The northern edge of the village is the North Branch of the Lamoille River, including flood hazard area, and Route 109 bisects the village. This area does not have historic sites of record and appears mostly residential in nature with one church. Several parcels in the proposed village center are either entirely or partially within the river corridor.

The proposed Belvidere Corners Village Center appears to meet the statutory standards for a village center.

Cambridge:

The majority of Cambridge is rural ag or forestry with rural general along areas of Route 15 and Route 108. Transition areas also generally frame areas of existing development along the Route 15 and Route 108 corridors. Rural conservation encapsulates State owned forest along the eastern boundary with Stowe excepting the resource based recreation around the Smugglers Notch Ski area. Several earth extraction areas are shown as enterprise. Cambridge has three village centers proposed:

1. **Jeffersonville Village Center** is formed with the legacy village and National Register Historic District at the core. The village area is proposed to expand to the confluence of the Lamoille and Brewster Rivers to the north and east. The expansion to the south includes the remainder of the Jeffersonville lands excluding one parcel that appears to be utilized for earth extraction that is enterprise. The expansion of the legacy center to the south and away from the flood hazard area is logical and incorporates a variety of commercial and residential properties as well as the elementary school that have a dense

development pattern that matches with the historic center. The remainder of the area is transition or enterprise for resource extraction.

The proposed Jeffersonville Village Center appears to meet the statutory standards for a village center.

2. **Upper Mountain Village** is along Route 108, the Notch Road, extending from the intersection of Pratt Road to Stebbins Road. The proposed village center includes several event facilities, residences, and commercial properties. Four properties along the northern edge of the proposed village center have flood hazard area from the Brewster River.

The proposed Upper Mountain Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** The center could be expanded to the east along Route 108 to include two additional parcels that include an event facility on the southeast corner of Stebbins Road and the dwelling across the street from it along Route 108.
3. **Cambridge Village Center** is proposed around the legacy village designation at the intersection of Route 15 and Lower Pleasant Valley Road. The area includes a National Historic District and a mix of commercial, residential, and religious uses around a historic green. A slight expansion from the legacy village is proposed to include whole parcels as well as six additional parcels to the south and west.

The proposed Cambridge Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendations:** Additional expansion should be considered to extend the center to the edge of the village boundary to the west to include all of the park and ride and two additional commercial properties especially as the area is ringed to the north by the Lamoille River flood hazard area and to the east by the Seymour River flood hazard area. Transition area rings the edges of the village center.

Eden:

No village center is proposed. The majority of Eden is rural ag or forestry or rural conservation. Rural general frames the area of Route 100 and Belvidere Road. There are enterprise areas for earth extraction and a resource based recreation area for the Lake Eden Recreation Area. Eden has three hamlets along Route 100 and a special use district for the vicinity of the asbestos mine.

- **Advisory Recommendation:** Consider a village center where the school, post office, etc. are located.

Elmore:

Elmore is rural ag or forestry with a substantial amount of rural conservation running through it including Elmore State Park. Rural general lines existing development areas along Route 12 and Cross Road.

Elmore Village Center is proposed in Elmore at the intersection of Route 12 and Elmore Pond Road that encompasses all of its legacy village designation plus two parcels. Both the proposed center and the legacy designation are focused on a National Register historic district. The area contains a general store, the town offices, a church, and residences along the shore of Lake Elmore just south of Elmore State Park. The flood hazard area corridor impacts five developed parcels where Elmore Pond Brook empties into Lake Elmore. The center is very compact and could be considered for future expansion to include adjacent residences to the north along Route 12 and to the east along Elmore Pond Road.

The proposed Elmore Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** consider expanding village center along Elmore Pond Road; consider resource-based recreation around some or all of Lake Elmore.

Hyde Park:

Hyde Park is mostly equal parts rural general and rural ag or forestry. The Green River Reservoir State Park is depicted as rural conservation. Industrial properties and earth resource extraction areas along Route 15 are shown as enterprise. Two village centers are proposed:

1. The Village of Hyde Park has proposed **Hyde Park Village Center** surrounding its legacy village designation along Main Street. The proposed center sits at the southern boundary of Hyde Park and extends from the boundary with Morrystown along the Lamoille Rail Trail to the south to Route 15 to the north encompassing the area of Depot Street, Johnson Street Extension, Church Street, and Eden Street. The county court house, sheriff's department, town offices, opera house, library, a historic inn, and several commercial and residential properties are within the center.

The proposed village center expands slightly to the south to include the remainder of the State Historic Register District. The expansion of the village center to the north stops at Route 15 and incorporates a variety of smaller residential properties, a cemetery, and a veterinary clinic. The regional high

school and town clerk's offices are excluded although just across Route 15. It is recommended that these properties be considered for inclusion in the center. The western expansion does not extend as far as the intersection of Main Street and Route 15. The expansion to the east incorporates the elementary school. The flood hazard area of the Centerville Brook delineates a transition to village area along the eastern border of the center.

The proposed Hyde Park Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendations:** It is recommended that the regional high school and town clerk's offices be considered for inclusion in the center.
2. **North Hyde Park Village Center** is proposed at the intersection of Route 100 and Ferry Street / North Hyde Park Road around a legacy village designation. The legacy area includes a portion of a State Register Historic District, a post office, event hall, and several commercial and residential properties. The Gihon River and Beaver Meadow Brook flood hazard areas bisect the proposed village center and include the majority of the legacy village.

The expansion incorporates the remainder of the historic district and the clustered dense area around it. To the north, the expansion includes a fire station and ends at the boundary with the armory. The expansion to the east includes several commercial and residential properties and terminates shortly after the intersection with Heath Road. The southern expansion ends just south of the intersection of Routes 100 and 100C and includes several residences, a child care facility, and a cemetery.

The proposed North Hyde Park Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** consider widening on the east side of Route 100 between Route 100C and Ferry Street, even though this will require the boundary to split some parcels; consider reducing the extent on the south side of Ferry Street by having the boundary split two parcels (266 Ferry Street, 360 Ferry Street).

Johnson:

No downtown, planned growth, village centers or areas or hamlets are proposed in Johnson Town. Transition area frames the village centers of Johnson Village and North Hyde Park.

The proposed **Johnson Village Center** is centered on a legacy village designation that includes a State Register Historic District at the intersection Route 15 and Route 100C. The Lamoille River and Gihon River and their flood

hazard area run through the middle of the center with a history of flooding. The village center is a slight expansion of the legacy village that includes parcels bisected by the designation, more of the historic district, and a portion of the Vermont State University (VTSU) at Johnson Campus to the north (17 parcels to the north and east). The expansion area along Railroad Street to the south includes a mix of commercial and residential parcels (approximately 65) that have a similar density to the existing village and provide expansion area for the village outside the flood hazard area. The western expansion of the center along Route 15 includes several residences, a commercial property, and a mobile home park. This expansion also provides an adjacent area to the center with similar development patterns that is outside the flood hazard area. Transition area spans the majority of the remainder of the village to the north and south.

The proposed Johnson Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** Given the historic flooding and the Village's work to explore non-floodplain expansion, it may be worthwhile to consider expanding the Village Center FLU area to include all or a portion of the VT State University campus and remaining parcels along School Street, and more or all of Lamoille View Drive and Clark Avenue.

Morristown

Morristown is a mix of rural general and rural ag or forestry with a pocket of rural conservation along the western border with Cambridge. Earth extraction areas are shown as resource extraction and transition areas surround the northern and western edge of Morrisville Village.

There are two village centers proposed.

1. **Morristown Corners Village Center** is at the intersection of Morristown Corners, Walton Road, and Stagecoach Road. The area has a restaurant and nursery with several residences clustered on relatively small lots along the roads.

The proposed Morristown Corners Village Center appears to meet the statutory standards for a village center.

2. **Morristown Cady's Falls Village Center** is located around the intersection of Cady's Falls Road, Needles Eye Road, and Griggs Road containing approximately 34 parcels. The area includes several commercial and residential properties in historic settlement area.

The proposed Morristown Cady's Falls Village Center appears to meet the statutory standards for a village center.

Stowe

Stowe is split between rural conservation, rural general, and rural ag or forestry. Rural general covers areas of existing development while rural conservation includes state owned forest and park. The Smugglers Notch Ski Resort and Trapp Family Lodge Resort are depicted as resource based recreation. Industrial and earth extraction areas are shown as enterprise.

There are three village centers proposed.

1. The **Stowe Moscow Village Center**, is proposed around a State Register Historic District at the intersection of Shaw Road, River Road, and Adams Mill Road. The area includes a religious institution, store, café, park, and several residences. The Little River flood hazard area frames the southern edge of the village.

The proposed Stowe Moscow Village Center appears to meet the statutory standards for a village center.

2. The **Stowe Upper Mountain Road Village Center** proposed at the intersection of Mountain Road and Luce Hill Road that includes lodging establishments, restaurants, shops, and residences. The West Branch Little River flood hazard area and community recreation path frame the southern boundary of the village. The area is a traditional center on the Mountain Road.

The proposed Stowe Upper Mountain Road Village Center appears to meet the statutory standards for a village center.

3. The **Stowe Mountain Road Crossroads Village Center** is proposed at the intersection of Edson Hill Road and Mountain Road and includes lodging establishments, restaurants, and residences. The West Branch Little River flood hazard area runs along the southern and western boundary. It is unclear if this is a traditional or historic center or what civic components may exist within this area.

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

- **Required Revisions:** Additional information is requested to substantiate the suitability of the proposed village center.

Waterville:

The majority of Waterville is rural ag or forestry with rural general along Route 109. An enterprise area is located in the vicinity of the municipal gravel pit.

Waterville Village Center is proposed at the intersection of Route 109 and Church Street that follows the boundaries of a legacy village designation. While the map viewer does not display it, the area is also a National Register District: <https://npgallery.nps.gov/AssetDetail/NRIS/07001026> . The town hall and town clerk's offices as well as a store and several residences are contained within the village center. The North Branch of the Lamoille River and flood hazard area frame the northern and western boundaries of the village center.

The proposed Waterville Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** consider expanding by adding depth on the eastern edge.

Wolcott

Wolcott is primarily rural ag or forestry with some rural conservation pockets. Rural general frames areas of existing development mostly in the vicinity of Route 15 and North Wolcott Road. Earth extraction areas are shown as enterprise.

Wolcott has two village centers:

1. The **Wolcott Village Center** on Route 15 radiates out from a legacy village designation that contains a State Register District. The expansion incorporates whole parcels that were bisected by the legacy designation as well as approximately 40 additional parcels. Many of the additional parcels appear to also be partially included. Some of these may be drafting errors (853 East Elmore Rd.). It is recommended that the village center follow parcel lines when feasible for ease of reference.

The legacy village contains the town offices, library, fire department, several commercial properties, and residences. The expansion area includes the post office, Wolcott School, recreation fields, cemetery, solar field, Lamoille Valley Rail Trail, two commercial properties, and several residences. The Lamoille River runs through the middle of the center and intersects with the Wolcott Pond Brook with both having flood hazard areas. The proposed village center provides for reasonable expansion of the legacy and historic village center to grow outside the limits of the flood hazard area that encapsulates much of its current core.

The proposed Wolcott Village Center appears to meet the statutory standards for a village center.

- **Advisory Recommendation:** Consider reducing the extent of the principal Village Center FLU area on the northwest corner, in order to eliminate the portion on the south side of the Lamoille River and Lamoille Valley Rail Trail. This undeveloped land is largely in the flood hazard area

and removed from roads, so is unlikely to see development consistent with the adjacent village center areas.

2. The **North Wolcott Village Center** is located along North Wolcott Road and contains a legacy village designation with a 14 parcel expansion to the north toward the intersection of Morey Hill Road and Reed Road. There is one store and one municipally owned parcel within the proposed center as well as several residences. The Wild Branch corridor frames the northern and eastern edge of the center with flood hazard area.

The proposed North Wolcott Village Center appears to meet the statutory standards for a village center.

(B) Planned Growth Areas

The statute describes “planned growth areas” as:

...high-density existing settlement and future growth areas with high concentrations of population, housing, and employment in each region and town, as appropriate. They include a mix of historic and nonhistoric commercial, residential, and civic or cultural sites with active streetscapes, supported by land development regulations; public water or wastewater, or both; and multimodal transportation systems. These areas include new town centers, downtowns, village centers, growth centers, and neighborhood development areas previously designated under chapter 76A of this title. These areas should generally meet the smart growth principles definition in chapter 139 of this title and the following criteria:

- (i) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with section 4350 of this title and has adopted bylaws and regulations in accordance with sections 4414, 4418, and 4442 of this title.
- (ii) This area is served by public water or wastewater infrastructure.
- (iii) The area is generally within walking distance from the municipality’s or an adjacent municipality’s downtown, village center, new town center, or growth center.
- (iv) The area excludes identified flood hazard and river corridor areas, except those areas containing preexisting development in areas suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule.
- (v) The municipal plan indicates that this area is intended for higher-density residential and mixed-use development.
- (vi) The area provides for housing that meets the needs of a diversity of social and income groups in the community.
- (vii) The area is served by planned or existing transportation infrastructure that conforms with “complete streets” principles as described under 19 V.S.A.

chapter 24 and establishes pedestrian access directly to the downtown, village center, or new town center. Planned transportation infrastructure includes those investments included in the municipality's capital improvement program pursuant to section 4430 of this title.

24 V.S.A. § 4348a(a)(12)(B).

A regional planning commission may request that the Board approve designation of areas on the FLU map as designated neighborhoods. Areas eligible for neighborhood designation include planned growth areas. 24 V.S.A. § 5804(a)(1). For the purposes designation, a "designated neighborhood" "...means a contiguous geographic area approved as part of the Land Use Review Board review of regional plan future land use maps that is compact and adjacent and contiguous to a center." 24 V.S.A. 5801(13). The mapped planned growth areas must meet the requirements of 24 V.S.A. § 4348a(a)(12)(B). The neighborhood designation recognizes that "the vitality of downtowns and villages is supported by adjacent and walkable neighborhoods and that the benefits structure must ensure that investments for sprawl repair or infill development within a neighborhood is secondary to a primary purpose to maintain the vitality and livability and maximize the climate resilience and infill potential of centers." 24 V.S.A. § 5804(a)(1).

Board Response:

The FLU map depicts the following **PLANNED GROWTH AREAS:**

- **Morristown** **Morristown Planned Growth Area**
- **Stowe** **Stowe Planned Growth Area**

Morristown Planned Growth Area:

A planned growth area extends from the northern edge of the downtown area to the northern boundary of Morrisville and includes a variety of businesses and residences. The Lamoille River forms the western boundary of the planned growth area. The eastern edge of planned growth area terminates with the boundary of the school and country club properties and includes the Morrisville Water and Light Department as well as several residences and businesses. The southern boundary of the planned growth area includes the Pleasant View Cemetery, a religious institution, and a variety of residences. The remainder of Morrisville is transition area.

The planned growth area is within walking distance of the downtown and is served by transit. The area is within the municipal water and wastewater service area. It is noted that the municipality has flood hazard regulations. While it is unclear if there are municipal river corridor regulations, the area is developed with areas suitable for infill. The municipal plan designates the planned growth area as both mixed use and medium density residential with the transition area as low density and hospital. The hospital complex may be appropriate to include in the planned growth area instead of the transition area.

The proposed Morrystown Planned Growth Area appears not to meet the statutory standards for a planned growth area.

Required Revisions:

- 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. Per 24 V.S.A. 4348a(a)(12)(B)(iv), Planned Growth Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines “infill development” as being, “an area that was not previously developed but is surrounded by existing development.” Examples of areas to redesignate include:
 - 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

Stowe Planned Growth Area:

A planned growth area rings the downtown on all sides except the north where a small pocket of planned growth is proposed around a grocery store. The area extends to the Stowe Hollow Road and Taber Hill Road vicinity on the east and down Route 100 to the Old Farm Road vicinity and down River Road to the Holmes Lane vicinity. On the northwest, the area extends up Weeks Hill Road to the intersection of Alpine Meadow Road and on the west up Luce Hill Road to the intersection with Bouchard Road.

The Town of Stowe has an adopted and approved plan and process. The Little River and West Branch Little River flood hazard areas run through the planned growth area. The West Branch Little River includes more area in the proposed planned growth area than the Little River particularly along the Route 108 corridor. The Little River flood hazard area are areas suitable for infill whereas the Route 108 / West Branch Little River corridor may be more expansive than limited infill. It is noted that the municipality has flood hazard & fluvial erosion hazard (river corridor) regulations.

The majority of the planned growth area is served by municipal water and wastewater with the exception of three parcels in the southwestern corner that appear to be located outside the sewer service area: 217 High Ridge Road, 721 Birch Hill Road, and 0 Mountain Road. These three parcels do appear to have suitable soils. The western planned growth area is served by the Stowe Rec Path and the corridors of Routes 100 and 108 are also served by transit. The periphery of the planned growth area is a mile from the downtown. State routes are prioritized for bicycle corridors. It is unclear if any community planning for complete streets.

The Town of Stowe has a current land use map from 2018 that shows the planned growth area as a mix of village commercial / residential and village residential with the edges being rural residential and forestry. It is noted that the map is land use and not future land use.

The Town of Stowe has a draft Town Plan under consideration and the draft future land use map shows the planned growth area as planned growth area. The new plan is due for adoption prior to November 2026.

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

Required Revisions:

- 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. Per 24 V.S.A. 4348a(a)(12)(B)(iv), Planned Growth Areas can only contain such areas if they are suitable for infill development as defined in section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule. Section 29-201 defines “infill development” as being, “an area that was not previously developed but is surrounded by existing development.” 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.

(C) Village Areas

The statute describes “village areas” and requires the following:

These areas include the traditional settlement area or a proposed new settlement area, typically composed of a cohesive mix of residential, civic, religious, commercial, and mixed-use buildings, arranged along a main street and intersecting streets that are within walking distance for residents who live within and surrounding the core. These areas include existing village center designations and similar areas statewide, but this area is larger than the village center designation. Village areas shall meet the following criteria:

- (i) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with section 4350 of this title.
- (ii) The municipality has adopted bylaws and regulations in accordance with sections 4414, 4418, and 4442 of this title.

- (iii) Unless the municipality has adopted flood hazard and river corridor bylaws, applicable to the entire municipality, that are consistent with the standards established pursuant to 10 V.S.A. § 755b (flood hazard) and 10 V.S.A. § 1428(b) (river corridor), the area excludes identified flood hazard and river corridors, except those areas containing preexisting development in areas suitable for infill development as defined in 29-201 of the Vermont Flood Hazard Area and River Corridor Rule.
- (iv) The municipality has either municipal water or wastewater. If no public wastewater is available, the area must have soils that are adequate for wastewater disposal.
- (v) The area has some opportunity for infill development or new development areas where the village can grow and be flood resilient.

24 V.S.A. 4348a(a)(12)(C).

A regional planning commission may request that the Board approve designation of areas on the FLU map as designated neighborhoods. Areas eligible for neighborhood designation include village areas. 24 V.S.A. § 5804(a)(1). For the purposes designation, a “designated neighborhood” “...means a contiguous geographic area approved as part of the Land Use Review Board review of regional plan future land use maps that is compact and adjacent and contiguous to a center.” 24 V.S.A. 5801(13). The mapped village areas must meet the requirements of 24 V.S.A. § 4348a(a)(12)(C). The neighborhood designation recognizes that “the vitality of downtowns and villages is supported by adjacent and walkable neighborhoods and that the benefits structure must ensure that investments for sprawl repair or infill development within a neighborhood is secondary to a primary purpose to maintain the vitality and livability and maximize the climate resilience and infill potential of centers.” 24 V.S.A. § 5804(a)(1).

Board Response:

The FLU map depicts the following **VILLAGE AREA**:

- **North Hyde Park North Hyde Park Village Area**

North Hyde Park Village Area:

The village area rings the proposed North Hyde Park Village Center, filling between its tentacles excepting enterprise areas. The village area includes several smaller residential lots to the north, parcels between the Gihon River and the Johnson boundary on the west and two larger somewhat undeveloped parcels to the south and east with one of the two parcels being owned by the Fire District.

The proposed North Hyde Park Village Area appears to meet the statutory standards for a village area.

- **Advisory Recommendation:** Extending from the eastern edge of the village center by the elementary school, the village area fills the area between Main Street and Route 15 and contains several larger commercial properties including a gym, brewery, and car dealership. A religious institution just across Route 15 from this area should be considered for inclusion.

(D) Transition or Infill Area

The statute describes “transition or infill areas” as:

...of existing or planned commercial, office, mixed-use development, or residential uses either adjacent to a planned growth or village area or a new stand-alone transition or infill area and served by, or planned for, public water or wastewater, or both. The intent of this land use category is to transform these areas into higher-density, mixed-use settlements, or residential neighborhoods through infill and redevelopment or new development. New commercial linear strip development is not allowed as to prevent it negatively impacting the economic vitality of commercial areas in the adjacent or nearby planned growth or village area. This area could also include adjacent greenfields safer from flooding and planned for future growth.

24 V.S.A. § 4348a(a)(12)(D).

Board Response:

Many of Lamoille County’s existing Downtown Centers and Village Centers are located in or near floodplains and/or other high-risk areas. Due to these risks, the Regional Plan includes Transition/Infill Areas in the broad description of Centers to facilitate investment in infrastructure and land use policies needed to facilitate development in safer areas less at risk to flooding.

The FLU map depicts the following transition/infill areas:

The 2026 map added Transition Areas. LCPC used “Transition” to identify a range of areas including areas around traditional village centers that have the potential for growth, but do not fit into the village center or village area categories, as well as in Belvidere in the area along VT RT 118 where the town is seeing growth, but there is a lack of any kind of civic anchor here but it has historically been a center of growth and there is an old School House. The transition areas are considered to be places where additional planning is needed before compact growth can happen.

The mapped Transition Infill Area in **Belvidere** depicts an area along Route 118 that is one of the few areas of the community where housing development may occur that is not located on a steep slope, in conflict with a water resource, or subject to conservation protections.

The Towns of **Johnson** and **Cambridge** include Transition Infill Areas adjacent to and between existing Village Centers. These areas depict areas where the Towns or Villages may consider land use bylaws, partner with housing organizations/developers

and/or invest in infrastructure to support housing development outside the floodplain. Planning in these Transition Infill Areas is especially important due to the devastating impacts of the 2023 flood in Johnson Village, Cambridge Village, and Jeffersonville.

The mapped Transition Infill Area in Belvidere depicts an area along Route 118 that is one of the few areas of the community where housing development may occur that is not located on a steep slope, in conflict with a water resource, or subject to conservation protections. The corner of Route 109 and Route 118 is depicted as a hamlet, though the historic farmstead once located at this corner has been lost.

The LCPC considered zoning, service areas, floodplains, and local input to align the Plan with municipal intent and regional consistency. State goals aim for 50% of new housing in Downtown and Village Centers, but Lamoille County faces challenges due to flood-prone areas and infrastructure limitations. To meet housing goals, strategic investment in infrastructure and land use tools is needed to shift development to safer areas. The Regional Plan includes Transition/Infill Areas to support development outside floodplains, especially after the 2023 flood impacts. Johnson and Cambridge have designated Transition Infill Areas for potential housing development, while Belvidere's mapped area along Route 118 offers a rare opportunity for development without environmental conflicts.

The proposed transition/infill areas appear to meet the statutory standards for a transition/infill area.

Advisory Recommendations:

Johnson:

- Consider shrinking the northern portion of the Transition FLU area on the VT State University parcel by having the boundary split that parcel – i.e., the undeveloped portion outside of the Johnson Village boundary.
- Consider shrinking the northern portion of the Transition FLU area off of Route 100C on the Hyde Park town line by having the boundary split the two or three largest parcels.

(E) Resource-Based Recreation Area

The statute describes “resource-based recreation area as “...large-scale resource-based recreational facilities, often concentrated around ski resorts, lakeshores, or concentrated trail networks, that may provide infrastructure, jobs, or housing to support recreational activities.” 24 V.S.A. § 4348a(a)(12)(E).

Board Response:

The FLU map depicts the following resource-based recreation areas:

The Resource Based Recreation Areas have been separated out of the 2023 Enterprise area and are primarily the ski resorts and surrounding area. These areas include large-

scale resource-based recreational facilities – specifically the Region’s three major ski resorts -- that may provide infrastructure, jobs, and housing to support recreational activities. These areas include several of the largest private sector employers within Lamoille County.

The proposed resource-based recreation areas appear to meet the statutory standards for a resource-based recreation area.

(F) Enterprise Areas

The statute describes “enterprise areas” as:

...locations of high economic activity and employment that are not adjacent to planned growth areas. These include industrial parks, areas of natural resource extraction, or other commercial uses that involve larger land areas. Enterprise areas typically have ready access to water supply, sewage disposal, electricity, and freight transportation networks.

24 V.S.A. § 4348a(a)(12)(F).

Board Response:

The FLU map depicts the following enterprise areas:

The Enterprise Areas now only include active gravel pits, industrial parks and areas planned for industrial parks. The Morristown/Stowe Airport is included in this category as the community identifies it as an Enterprise Area.

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:

Johnson:

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

(G) Hamlets

The statute describes “hamlets” as:

small historic clusters of homes and may include a school, place of worship, store, or other public buildings not planned for significant growth; no public water supply or wastewater systems; and mostly focused along one or two roads. These may be depicted as points on the future land use map.

24 V.S.A. § 4348a(a)(12)(G).

Board Response:

The FLU map depicts three hamlets in the Town of Eden:

- The corner of Route 109 and Route 118 is depicted as a hamlet, though the historic farmstead once located at this corner has been lost.
- Route 109 south of Route 118.
- Route 109 norther of Route 118.

The proposed hamlets appear to meet the statutory standards for a hamlet.

(H) Rural

The statute has three categories of rural: Rural - General, Rural - Agricultural and Forestry, and Rural - Conservation. 24 V.S.A. § 4348a(a)(12)(H)-(J). They are described as follows:

Rural - General. These areas include areas that promote the preservation of Vermont's traditional working landscape and natural area features. They allow for low-density residential and some limited commercial development that is compatible with productive lands and natural areas. This may also include an area that a municipality is planning to make more rural than it is currently. 24 V.S.A. § 4348a(a)(12)(H).

Rural - Agricultural and Forestry. These areas include blocks of forest or farmland that sustain resource industries, provide critical wildlife habitat and movement, outdoor recreation, flood storage, aquifer recharge, and scenic beauty, and contribute to economic well-being and quality of life. Development in these areas should be carefully managed to promote the working landscape and rural economy, and address regional goals, while protecting the agricultural and forest resource value. 24 V.S.A. § 4348a(a)(12)(I).

Rural - Conservation. These are areas of significant natural resources, identified by regional planning commissions or municipalities based upon existing Agency of Natural Resources mapping that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes. The mapping of these areas and accompanying policies are intended to help meet requirements of 10 V.S.A. chapter 89. 24 V.S.A. § 4348a(a)(12)(J).

Mapped flood hazard areas should be excluded from planned growth areas and village areas, and mapped as Rural - Conservation, unless the municipality has adopted flood hazard and river corridor bylaws consistent with 24 V.S.A. § 4348a(a)(12). Per the VAPDA methodology, wetlands over five acres in size should be mapped as Rural - Conservation. Smaller wetlands should be mapped the same as the surrounding future land use area.

Board Response: The Rural and Working Lands Area is made up of those areas designated in local plans primarily for lower density development, agriculture, and

forestry. This area covers a large portion of Lamoille County's land area and includes agricultural land and forest land interspersed with clusters and nodes of development. As used in this Regional Plan, the term, "Rural and Working Lands" refers broadly to the Rural General and Rural Working Lands/Agriculture and Forestry Areas identified on the Future Land Use Map. Rural enterprises, small businesses, agriculture and forestry and supportive activities, and rural residential subdivisions are all expected to continue in these areas. Use of development tools such as conservation subdivision, Planned Unit Developments (PUDs), and Transfers of Development Rights (TDRs) are strongly encouraged in this area. This area also contains Lamoille County's largest blocks of unfragmented forests.

The proposed rural – general areas appear to meet the statutory standards for rural – general areas.

The proposed rural – agriculture and forestry areas appear to meet the statutory standards for rural – agriculture and forestry areas.

The proposed rural – conservation areas appear to meet the statutory standards for rural – conservation areas.

Advisory Recommendations:

General Comments:

- Fill in the mapping "holes" where lakes and ponds are located in Eden (two examples) and Elmore (three examples). Select an appropriate FLU type per the VAPDA methodology.

Rural General is used extensively in Stowe, Morristown, and Eden. Consider more Rural Agriculture/Forest in less densely settled areas. See below for specific examples for these municipalities.

- **Eden:** As noted in the general mapping comments, some Rural General FLU areas are quite sparsely settled, with intact forest. Consider mapping as Rural Agriculture/Forest instead. Examples include:
 - Southeast of Blakeville Road to South Pond
 - Northeast of Route 118 to the asbestos mine special use FLU area
- **Johnson:**
 - Explain the single-parcel Enterprise FLU area on the south side of Plot Road, or simply redesignate as Rural Agriculture/Forest. Appears to be undeveloped forest owned by the town on a parcel with no road frontage.
- **Morristown** – As noted in the general mapping comments, some Rural General FLU areas are quite sparsely settled, with intact forest. Consider mapping as Rural Agriculture/Forest instead. Examples include:
 - East of Elmore Mountain Road to the Elmore town line

- Darling Road area (off of Route 15A)
- Large undeveloped parcel at the end of Gallup Road, on Town Highway 49
- **Stowe:**
 - As noted in the general mapping comments, some Rural General FLU areas are quite sparsely settled, with intact forest. Consider mapping as Rural Agriculture/Forest instead. Examples include:
 - Brownsville Road, McCall Pasture Road area
 - Southeast corner of town along Stowe Hollow Road and Waterworks Road
 - End of Luce Hill Road

E. Tier 1B Area Status

With Tier 1B Status Requests, the Board's review has two parts: first, whether each municipality with proposed Tier 1B status areas meets the six requirements of 10 V.S.A. § 6033(c), and, second, whether the underlying proposed Tier 1B area/s as designated in the Future Land Use Map met the requirements for a "downtown or village centers", "planned growth areas", and "village areas" as described in 24 V.S.A. § 4348a(12)(A)-(C). Below details whether the Tier 1B is consistent with six subsections of 10 V.S.A. § 6033(c). The Commission will also need to reference back to Section I(D)(12)(A)-(C) of this preapplication response related to the land use categories and make any necessary changes to conform with the requirements of 24 V.S.A. § 4348a(a)(12)(A)-(C).

For Tier 1B status requests, the Commission must demonstrate the following:

- (1) The municipality has requested to have the area mapped for Tier 1B.
- (2) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with 24 V.S.A. § 4350.
- (3) The municipality has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442.
- (4) The area excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule unless the municipality has adopted flood hazard and river corridor bylaws applicable to the entire municipality that are consistent with the standards established pursuant to subsection 755(b) of this title (flood hazard) and subsection 1428(b) of this title (river corridor).
- (5) The municipality has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in the area proposed for Tier 1B.
- (6) The municipality has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area.

10 V.S.A. § 6033(c).

Board Response: The Commission presented Tier 1B status requests on behalf of the following municipalities:

- **Town of Hyde Park** North Hyde Park Village Center and Village Area
- **Town of Stowe** Stowe Village Area (Downtown)
- **Town of Stowe** Stowe Mountain Road Village (Mtn. & Luce Roads)
- **Town of Morristown** Morrisville Downtown Center & Morristown PGA

Town of Hyde Park - Per LCPC Ex. 016 and in accordance with the Act 181 future land use mapping methodology, Tier 1B status is sought for the:

- **North Hyde Park Village Center and Village Area:**
 - (1) The municipality has requested to have the area mapped for Tier 1B:
See Municipal Certification by Chasity Fagnant, Selectboard Chair, 12/30/2025; Selectboard Meeting Minutes approving Tier 1B resolution, 12/30/2025; N. Hyde Park Tier 1B Map.
 - (2) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with 24 V.S.A. § 4350:
Municipal Certification by Chasity Fagnant, Selectboard Chair, 12/30/2025; LCPC Resolution for the Approval of the Hyde Park Municipal Plan, 1/23/2018.
 - (3) The municipality has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442:
Municipal Certification of zoning and subdivision bylaws adopted 4/30/2018 by Chasity Fagnant, Selectboard Chair, 12/30/2025.
 - (4) The area excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule unless the municipality has adopted flood hazard and river corridor bylaws applicable to the entire municipality that are consistent with the standards established pursuant to subsection 755(b) of this title (flood hazard) and subsection 1428(b) of this title (river corridor):
Regional Certification of Flood Hazard Bylaw adoption 1/28/2025 by Tasha Wallis, LCPC Executive Director, 1/7/2026. The Flood Hazard

Overlay in Sec. 5.10 (pg. 30-38) includes 100-year floodplains and river corridors and was developed with input from VT DEC.”

- (5) The municipality has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in the area proposed for Tier 1B:

Regional Certification by Tasha Wallis, LCPC Executive Director, 1/7/2026 of “existing public or community water system in the area proposed for Tier 1B.”

- (6) The municipality has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area:

Municipal Certification by Chasity Fagnant, Selectboard Chair, 12/30/2025.

At this time, Hyde Park appears to meet the requirements for Tier 1B status for the North Hyde Park Village Center and Village Area as enumerated in 10 V.S.A. 6033(c).

Town of Stowe -

The Town of Stowe is requesting Tier 1B status under Act 250 for the majority of the Downtown Center and the mapped Village Center along Route 108 at the intersection of Luce Hill Road in accordance with the Act 181 future land use mapping methodology. This Tier 1B request follows the existing Stowe Zoning Regulations and where the Town anticipates growth in future residential and commercial development.

The Future Land Use Map depicts Downtown, Village Center, and Planned Growth Areas that are larger than the Town of Stowe’s Tier 1B request. Stowe’s existing water/sewer infrastructure faces capacity limitations and other challenges. The lower village wastewater pump station is near the end of its useful life and approaching design limits for capacity during high flow events. The Town’s water system will need to secure and develop a new drinking water source.

Key intersections on Route 108 also experience significant delays and unfavorable volume to capacity ratios during peak season. The Town requires a partial Tier 1B eligible area while it works to implement the needed upgrades to its water, wastewater and transportation infrastructure.

Much of Stowe’s “Planned Growth Area” not included in the initial Tier 1B request contains many properties subject to legacy Act250 permits. Finally, much of the recent development in Stowe has consisted of high-end housing and/or second homes. The Town is conscious of the need to use limited infrastructure capacity to support the need for modest, year-round residences that is affordable to the community’s workforce. As

such, the Town of Stowe is working to develop local tools to address this concern before pursuing Tier IB in the full eligible area.

Town of Stowe – Per LCPC Ex. 016 and in accordance with the Act 181 future land use mapping methodology, Tier 1B status is sought for the:

- The core **Stowe Village Area** which is centered on the legacy downtown area at the intersection of Main Street, Mountain Road, and Maple Street and includes the Stowe Downtown Center area, excepting the northern area along Weeks Hill Road.
- The **Mountain Road Village** which is the Upper Mountain Road Village Center located at the intersection of Mountain Road and Luce Hill Road.

- (1) The municipality has requested to have the area mapped for Tier 1B:
Municipal Certification by Charles Safford, Town Manager, 11/21/2025.
Selectboard Meeting Minutes approving Tier 1B resolution, 12/30/2025;
Stowe Tier 1B Map.
- (2) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with 24 V.S.A. § 4350:
Municipal Certification by Charles Safford, Town Manager, 11/21/2025;
LCPC Resolution for the Approval of the Stowe Municipal Plan, 1/22/2019;
LCPC Resolution for Confirmation of the Municipal Planning Process for the Town of Stowe, 1/22/2019.
- (3) The municipality has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442:
Municipal Certification of zoning bylaws adopted 1/10/2024 and
subdivision bylaws adopted 6/25/2012 by Charles Safford, Town Manager, 11/21/2025.
- (4) The area excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule unless the municipality has adopted flood hazard and river corridor bylaws applicable to the entire municipality that are consistent with the standards established pursuant to subsection 755(b) of this title (flood hazard) and subsection 1428(b) of this title (river corridor):
Regional Certification of Flood Hazard Bylaw adoption 1/31/2024 with
Fluvial Erosion Hazard Overlay District by Tasha Wallis, LCPC Executive Director, 1/7/2026.

- (5) The municipality has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in the area proposed for Tier 1B:
Regional Certification by Tasha Wallis, LCPC Executive Director, 1/7/2026 of existing public or community water system in the area proposed for Tier 1B.
- (6) The municipality has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area:
Municipal Certification by Charles Safford, Town Manager, 11/21/2025.

At this time, Stowe appears to meet the requirements for Tier 1B status as enumerated in 10 V.S.A. 6033(c).

Town of Morristown - Per LCPC Ex. 016 and in accordance with the Act 181 future land use mapping methodology, Tier 1B status is sought for the:

- The **Morrisville Downtown Center and Morristown Planned Growth Area:**
 - (1) The municipality has requested to have the area mapped for Tier 1B:
Municipal Certification by Don McDowell, Selectboard Chair, 3/4/2026; Morrisville Tier 1B Map.
 - (2) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with 24 V.S.A. § 4350:
Municipal Certification by Don McDowell, Selectboard Chair, 3/4/2026.
LCPC Municipal Plan Certification by Tasha Wallis; Town Plan adoption – 9/16/24; Regional approval – 11/26/24; Planning process – confirmed.
 - (3) The municipality has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442:
Municipal Certification of zoning and subdivision bylaws adopted 11/1/22 by Don McDowell, Selectboard Chair, 3/4/2026.
 - (4) The area excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule unless the municipality has adopted flood hazard and river corridor bylaws applicable to the entire municipality that are consistent

with the standards established pursuant to subsection 755(b) of this title (flood hazard) and subsection 1428(b) of this title (river corridor):

Regional Certification by Tasha Wallis, LCPC Executive Director, 3/4/2026 that all flood-risk areas are excluded from the Tier 1B areas. (Flood hazard, but no river corridor bylaws).

- (5) The municipality has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in the area proposed for Tier 1B:

Regional Certification by Tasha Wallis, LCPC Executive Director, 3/4/2026 of existing public or community water and wastewater systems in the area proposed for Tier 1B.

- (6) The municipality has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area:

Municipal Certification by Don McDowell, Selectboard Chair, 3/4/2026.

At this time, Morristown appears to meet the requirements for Tier 1B status for the Morrisville Downtown Center and Morristown Planned Growth Area as enumerated in 10 V.S.A. 6033(c).

II. CONCLUSION

To the extent that a statutory standard as indicated above does not appear to be met, the Board requests the Commission revise the plan to address the deficiency or provide additional information with the adopted regional plan application that addresses the deficiency. Recommendations for revision indicated above are optional. This preapplication response is advisory only and does not guarantee an affirmative determination when the adopted plan or Tier 1B status request is submitted pursuant to Section 1.200 of the Board's Regional Planning Commission Application Guidelines.

Please contact the Board via email at Act250.Board@vermont.gov with any questions about this regional plan and Tier 1B request preapplication response.

Dated this March 23, 2026

Sincerely,

/s/ L. Brooke Dingleline

Brooke Dingleline, Board Member

Adopted by the Board at the March 23, 2026 meeting.

RECIPIENT LIST

A copy of the foregoing **Preapplication Response Letter** for RPC05-0001 has been sent on March 23, 2026, to the following individuals by electronic mail:

APPLICANT

Lamoille County Planning Commission,
Attn: Tasha Wallis
PO Box 1637
52 Portland Street, Second Floor
Morrisville, Vermont 05661
tasha@lcpcvt.org

Lamoille County Planning Commission,
Attn: Meghan Rodier
Meghan@lcpcvt.org

Lamoille County Planning Commission,
Attn: Seth Jensen
Seth@lcpcvt.org

PARTNER AGENCIES

Vermont Agency of Agriculture, Food and
Markets
116 State Street, Drawer 20
Montpelier, VT 05620-2901
agr.act250@vermont.gov

Department of Housing & Community
Development
Agency of Commerce and Community
Development
National Life Building, 6th Floor, Drawer 20
Montpelier, VT 05620-0501
Alex.Farrell@vermont.gov
Nate.Formalarie@vermont.gov
Grace.Vinson@vermont.gov

Agency of Natural Resources
1 National Life Drive, Davis 2
Montpelier, VT 05620-3901
anr.act250@vermont.gov

Community Investment Board
Deane Davis Building, 2nd Floor
1 National Life Drive
Montpelier, VT 05602
Jacob.Hemmerick@vermont.gov

Department of Public Service
45 State Drive
Waterbury, VT 05671-1300
PSD.PlanningStandards@vermont.gov
Anne.Margolis@vermont.gov
Claire.McIlvennie@vermont.gov

Vermont Emergency Management
Department of Public Safety
45 State Drive
Waterbury, VT 05671-1300
psd.vtdps@vermont.gov
Eric.Forand@vermont.gov
Mark.Bosma@vermont.gov
Stephanie.A.Smith@vermont.gov

Vermont Agency of Transportation
Barre City Place
219 N. Main Street
Barre, VT 05641
AOT.Act250@vermont.gov

FOR INFORMATION ONLY

Vermont Natural Resources Council, Attn:
Jon Groveman
11 Baldwin Street
Montpelier, Vermont 05602
info@vnrc.org

RPC05-0001
Land Use Review Board
Preapplication Response
Page 52 of 52

Dated March 23, 2026,

/s/ Rachel Lomonaco

Rachel Lomonaco

Land Use Review Board

Business Director

act250.board@vermont.gov