



To: Land Use Review Board  
10 Baldwin Street  
Montpelier, VT 05633-3201

From: Jak Tiano, Let's Build Homes Policy Director  
Miro Weinberger, Let's Build Homes Executive Chair

Date: November 24th, 2025

**RE: NRPC Tier 1B Pre-application Submission**

To the Members of the Board,

On behalf of Let's Build Homes, we are writing to offer comments in support of the Future Land Use Map and Tier 1B pre-application submitted by the Northwest Regional Planning Commission (NRPC).

Our organization has conducted an internal review of the proposed maps, specifically comparing the proposed Tier 1B areas against the Interim Act 250 Housing Exemption maps. We found that the NRPC proposal largely maintains or expands the footprint of these priority housing areas. We view this as a positive signal that the maps were drawn with the intent to facilitate—rather than constrain—the housing growth necessary to meet the state's urgent needs.

We agree with the methodology presented in this plan and believe it offers a sound framework for Act 181 compliance. Specifically, we wish to highlight three aspects of the application that align with our organization's priorities for housing growth:

**Housing Allocation Metrics**

We support the NRPC's approach to distributing their regional housing targets. The application explicitly allocates 60% of the region's 2050 housing target to Planned Growth Areas. While regions are required by statute to utilize housing targets in their mapping, we agree with the specific decision to concentrate such a substantial majority of the target into these growth areas. This ensures that the drawn boundaries are not arbitrary, but are physically sized to accommodate the density required to meet the region's share of the statewide housing goal, without relying on haphazard sprawl.

## **The Value of "Transitional" Areas**

We see value in the areas designated as "Transitional", and are pleased to see the Commission's intent to help municipalities plan for these areas to eventually meet the conditions for Planned Growth Areas. We view this as an important mechanism for expanding the state's housing capacity over time, creating a smart pipeline for future growth rather than treating the current map as a static limit.

## **Infrastructure Alignment and Capacity Assessment**

The application aligns mapping with infrastructure realities. It candidly identifies that map designations alone do not build homes, noting, for example, that specific growth centers like Fairfax currently face wastewater capacity limits that act as barriers to development. We appreciate this level of detail, as it highlights where state and local resources must be directed to unlock the density allowed by the map.

## **Conclusion**

We view the NRPC application as a solid, compliant framework that provides the necessary "regulatory container" for the region to meet its housing goals.

However, our support is offered with the recognition that these maps are a prerequisite for housing growth, not a guarantee of it. The success of these Tier 1B areas will ultimately be determined by whether the municipal zoning and other regulatory barriers *inside* these lines allow for the density assumed in the targets, and whether the needed infrastructure investments identified in the plan are funded and built.

Furthermore, given the possibility that maps may under-deliver, and the opportunities presented by the Transition areas identified in the plan, we believe it is critical to ensure that map expansion processes are developed that are simple and straightforward. This will allow the framework to remain responsive and grow alongside Vermont's evolving housing needs.

We look forward to the Board's review of this application as a strong foundation for that future work.