

**STATE OF VERMONT
LAND USE REVIEW BOARD**

RE: Northwest Regional Plan

Application # RPC08-0001

**Determination of Regional Plan Compliance
and
Future Land Use Map Designations for Tier 1B Areas**

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I. INTRODUCTION

On March 30, 2026, the Northwest Regional Planning Commission (“NRPC”) filed application # RPC08-0001 with the Land Use Review Board for a Determination of Regional Plan Compliance of the Northwest Regional Plan adopted on March 25, 2026 (“Plan”) and, concurrently, for approval of requested Tier 1B status areas. The application was deemed complete on April 8, 2026.

The Land Use Review Board convened a public hearing in this matter on May 19, 2026 and May 28, 2026 at St. Albans City Hall, 100 North Main Street, St. Albans, Vermont and closed the record on May 28, 2026.

The Board deliberated on the application on May 28, 2026, June 10, 2026 and June 12, 2026. The facts relied upon by the Board are contained in the documents on file identified as Exhibits 019 – 037, the Geographic Information System (“GIS”), Future Land Use (FLU) and Tier 1B mapping on file on the Land Use Review Board’s “Future Land Use & Tier 1A/B Viewer,” and the testimonial evidence received at the public hearing.

As set forth below, pursuant to 24 V.S.A. § 4348, 10 V.S.A. §6033, and 24 V.S.A. Chapter 139, the Board has determined that the Plan complies with statutory standards and has approved the future land use map designations for Tier 1B areas.

II. PARTIES

The Applicant, Northwest Regional Planning Commission was represented by Catherine Dimitruk, Greta Brunswick, and Luke Slomba.

The Board did not receive any objections from interested parties as defined in 24 V.S.A. § 4348(i).

III. SCOPE OF REVIEW

To issue an affirmative determination of regional plan compliance, the Board must find that the Plan meets the following requirements:

(A) Consistency with the State planning goals as described in 24 V.S.A. §4302 with consistency determined in the manner described under 24 V.S.A. §4302(f)(1).

(B) Consistency with the purposes of the regional plan established in 24 V.S.A. §4347.

(C) Consistency with the regional plan elements as described in section 24 V.S.A. §4348a.

(D) Compatibility with adjacent regional planning areas in the manner described under 24 V.S.A. §4302(f)(2).

The Board will also review whether the Future Land Use (FLU) boundaries of the downtown centers, village centers, planned growth areas, and village areas, meet the requirements of 24 V.S.A. §§ 5803 and 5804. 24 V.S.A. § 4348(h)(4)(C), and 4348a(a)(12)(a)-(c).

To grant Tier 1B status, the Board must find that each municipality with proposed Tier 1B status areas meets the six requirements of 10 V.S.A. § 6033(c), and, that the underlying proposed Tier 1B area(s) as designated in the FLU Map meets 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). In addition, the Board must find that the criteria in 24 V.S.A. Chapter 139 are met.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

A. GENERAL FINDINGS

1. The Northwest Regional Planning Commission (“NRPC”) adopted its regional plan (“Plan”) on March 25, 2026.
2. On March 30, 2026, NRPC filed application # RPC08-0001 with the Land Use Review Board for a Determination of Compliance of the Plan and, concurrently, for Approval of Future Land Use Maps identifying areas for Tier 1B designation.
3. The Plan and supporting information, hearing notices, and comments received, are compiled as Exhibits 019 to 037 on the Act 250 Database under project number RPC08-0001.
4. The Geographic Information System (“GIS”) Future Land Use (FLU) and Tier 1B mapping is an integral part of the Plan and is provided on the Land Use Review Board’s “Future Land Use & Tier 1A/B Viewer” for which a link is available on the Act 250 website (<https://act250.vermont.gov/>).
5. The Board did not receive any objections pursuant to 24 V.S.A. § 4348(i).
6. The application was deemed complete on April 8, 2026.
7. On April 22, 2026, the Board issued a notice of public hearing pursuant to 24 V.S.A. § 4348(h)(2).
8. On May 5, 2026, NRPC notified the Board that it sent notice of the public hearing to its municipalities as required by 24 V.S.A. § 4348(h)(2) and posted notice on its website.
9. The Board held a public hearing at the St. Albans City Hall on May 19, 2026 and continued the hearing on May 28, 2026 in an abundance of caution to ensure the public had an opportunity to comment.
10. The record closed on May 28, 2026.

B. CONSISTENCY WITH STATE PLANNING GOALS

1. Consistency with the State planning goals as described in 24 V.S.A. § 4302

a. Consistency with 24 V.S.A. § 4302(a)

It is the intent and purpose of 24 V.S.A. § 4302(a) to:

...encourage the appropriate development of all lands in this State by the action of its constituent municipalities and regions, with the aid and assistance of the State, in a manner which will promote the public health, safety against fire, floods, explosions, and other dangers; to promote prosperity, comfort, access to adequate light and air, convenience, efficiency, economy, and general welfare; to enable the mitigation of the burden of property taxes on agricultural, forest, and other open lands; to encourage appropriate architectural design; to encourage the development of renewable resources; to protect residential, agricultural, and other areas from undue concentrations of population and overcrowding of land and buildings, from traffic congestion, from inadequate parking and the invasion of through traffic, and from the loss of peace, quiet, and privacy; to facilitate the growth of villages, towns, and cities and of their communities and neighborhoods so as to create an optimum environment, with good civic design; to encourage development of a rich cultural environment and to foster the arts; and to provide means and methods for the municipalities and regions of this State to plan for the prevention, minimization, and future elimination of such land development problems as may presently exist or which may be foreseen and to implement those plans when and where appropriate. In implementing any regulatory power under this chapter, municipalities shall take care to protect the constitutional right of the people to acquire, possess, and protect property.

24 V.S.A. § 4302(a).

11. The Plan promotes the public health, safety against fire, floods, explosions, and other dangers, as follows:

- The Plan promotes public health through a dedicated Community Health chapter that identifies social determinants, health access and equity, and includes goals and policies; it also addresses safe services via the Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste chapter with goals, future needs, and policies (Community Health, Pages 62–69; Infrastructure, Pages 135–140; Goals and Policies, page 140).
- The Plan promotes safety against fire, floods, explosions, and other dangers in the Disaster Resilience chapter, which identifies and assesses hazards (e.g., Flooding and Fluvial Erosion; Severe Storms; Hazardous Materials—fixed site

and transport; Structure Fire), presents vulnerability and response information (Table 7 First Response Agencies; Table 8 Relative Risk; Tables 9–11 on disasters and structures in flood/river corridors; Map 16 River Corridors; Figure 6 Four Phases of Emergency Management), and sets goals and policies for mitigation, preparedness, response, and recovery (Disaster Resilience, Pages 118–133).

12. The Plan promotes prosperity, comfort, access to adequate light and air, convenience, efficiency, economy, and general welfare, as follows:

- The Plan promotes prosperity, convenience, efficiency, economy, and general welfare through comprehensive goals and policies in Economic Development (assets, workforce, broadband), Energy (conservation and generation), Transportation (Complete Streets, project priorities), Housing (municipal targets and strategies), and Infrastructure (water supply, wastewater, stormwater, solid waste) (Economic Development, pages 21–33; Energy, pages 34–39; Transportation, pages 70–87; Housing, pages 49–61; Infrastructure, pages 135–140).
- The Plan supports comfort and access to clean air and overall welfare by addressing environmental indicators for air quality (PM2.5 and ozone) in its Environmental Justice analysis, protecting natural resources, and guiding appropriate development through Current and Future Land Use and designated areas (Equitable Planning/EJ Screen — Introduction, pages 10–11; Natural & Cultural Resources, pages 89–102; Land Use, pages 104–116; Appendix III — Environmental Benefits & Burdens Analysis, pages 147–152).

13. The Plan enables the mitigation of the burden of property taxes on agricultural, forest, and other open lands and encourages appropriate architectural design, as follows:

- The Plan addresses agricultural, forest, and open lands through dedicated sections and mapping—“Farms and Farmland,” “Forestland, Wildlife Habitat and Natural Areas,” and “Future Land Use” with FLU descriptions and Designated Areas—and documents alignment with Vermont planning goals and Title 24, indicating consideration of state objectives relevant to these lands (Land Use, pages 106–116; Natural & Cultural Resources, pages 89–102; The Plan in Context, pages 18–19).
- Although the Plan does not encompass specific building architectural design standards, the Plan encourages appropriate design by establishing Complete Streets implementation policies that guide local street and site design (Physical Region — Figure 4: Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Land Use — Designated Areas, page 115).

14. The Plan encourages development of renewable resources, as follows:

- The Plan's Energy chapter establishes future targets for energy use and generation, includes Guiding Policy Statements, and sets Goals and Policies for Energy Conservation and Energy Generation aligned with statewide greenhouse gas and Comprehensive Energy Plan goals—collectively encouraging renewable resource development (Energy, pages 34–39).
- The Plan provides technical and implementation guidance for renewables through the Regional Energy Plan and analysis of Regional Generation Capacity, including an outline for the Northwest Regional Energy Plan and capacity data that support renewable siting and development (Appendix II – Northwest Regional Energy Plan, page 146; Energy, page 36).

15. The Plan protects residential, agricultural, and other areas from undue concentrations of population and overcrowding of land and buildings, from traffic congestion, from inadequate parking and the invasion of through traffic, and from the loss of peace, quiet, and privacy, as follows:

- The Plan promotes growth in designated areas and preservation of rural and agricultural landscapes through Current and Future Land Use, Future Land Use Planning Areas (FLUs) with mapping criteria for Centers, Planned Growth Areas, and Village Areas, and Designated Areas—thereby protecting residential, agricultural, and other areas from undue concentrations of population and overcrowding (Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical Region — Figure 5: Rural Future Land Use (FLU) Planning Area Mapping Criteria, page 114; Land Use — Designated Areas, page 115).
- The Plan manages traffic impacts through Transportation goals and policies, Complete Streets implementation policies, and planning for project priorities, commuting, and facilities—measures that address congestion and through-traffic and support neighborhood livability (Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Transportation — Project Priorities, page 85; Physical Region — Transportation Facilities, page 76; Transportation — Commuting, page 78).

16. The Plan facilitates the growth of villages, towns, and cities and of their communities and neighborhoods so as to create an optimum environment, with good civic design, as follows:

- The Plan delineates Future Land Use Planning Areas with mapping criteria for Centers, Planned Growth Areas, and Village Areas, and provides maps of these areas to guide coordinated growth of villages, towns, cities, and their neighborhoods (Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical

Region — Map 14: Northwest Region Centers and Village Areas, page 111;
Physical Region — Map 15: Northwest Region Centers and Planned Growth
Areas, page 112; Land Use — Designated Areas, page 115).

- The Plan supports good civic design through Complete Streets implementation policies that inform street and site design in centers and neighborhoods, and through frameworks for coordination with State permitting and compatibility with municipal plans (Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Land Use — Coordination With State Act 250 Permitting, page 116; The Plan in Context, pages 18–19).

17. The Plan encourages development of a rich cultural environment and fosters the arts, as follows:

- The Plan explicitly addresses arts, culture, and the creative economy within regional economic development, with goals and policies to foster the arts and cultural vitality (Arts, Culture, and the Creative Economy, page 26; Economic Development, pages 21–33).
- The Plan supports a rich cultural environment through planning for education, libraries, and recreation facilities, and by mapping community facilities and trails, with accompanying goals and policies to enhance these amenities (Infrastructure: Education, Libraries & Recreation Facilities, pages 43–47; Map 2: Northwest Region Facilities, page 45).

18. The Plan provides means and methods for the municipalities and regions of this State to plan for the prevention, minimization, and future elimination of such land development problems as may presently exist or which may be foreseen and to implement those plans when and where appropriate, as follows:

- The Plan provides means to prevent and minimize land development problems by directing growth through mapped Future Land Use Planning Areas and criteria, protecting natural and cultural resources, and evaluating Substantial Regional Impact and Cumulative Impacts (Land Use, pages 104–116; Natural & Cultural Resources, pages 89–102; Putting the Plan Into Action, pages 13–18).
- The Plan incorporates implementation methods for municipalities via defined action steps and roles in Implementation Tables, alignment and compatibility standards with municipal and adjoining regional plans, coordination with State Act 250 permitting, and infrastructure planning for water, wastewater, stormwater, and solid waste (Putting the Plan Into Action, pages 13–17; The Plan in Context, pages 18–19; Land Use — Coordination With State Act 250 Permitting, page 116; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135–140).

19. The Plan addresses whether municipalities shall take care to protect the constitutional right of the people to acquire, possess, and protect property, as follows:

- The Plan confirms compatibility with Title 24 V.S.A. Chapter 117 and Vermont Planning Goals, establishing the statutory framework within which municipalities plan and make land-use decisions (The Plan in Context, pages 18–19; Figure 5: Vermont Planning Goals, page 19).
- The Plan states that NRPC has no taxing or regulatory authority and documents collaboration with municipalities to revise the Regional Future Land Use Map based on local feedback, indicating that municipalities retain decision-making roles affecting property and land use (Introduction, page 2, page 13).

Based on the above findings, the Board concludes that the Plan is consistent with state planning goals of 24 V.S.A. § 4302(a).

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

The next goal is whether the regional planning commission engaged in a continuing planning process, specifically:

It is also the intent of the Legislature that municipalities, regional planning commissions, and State agencies shall engage in a continuing planning process that will further the following goals:

- (1) To establish a coordinated, comprehensive planning process and policy framework to guide decisions by municipalities, regional planning commissions, and State agencies.
- (2) To encourage citizen participation at all levels of the planning process, and to assure that decisions shall be made at the most local level possible commensurate with their impact.
- (3) To consider the use of resources and the consequences of growth and development for the region and the State, as well as the community in which it takes place.
- (4) To encourage and assist municipalities to work creatively together to develop and implement plans.

24 V.S.A § 4302(b).

20. The Plan is consistent with a coordinated, comprehensive planning process and policy framework to guide decisions by municipalities, regional planning commissions, and State agencies, as follows:

- The Plan states it is “intended for use as a guide for decision makers” and was prepared under the direction of the NRPC Board of Commissioners and the Plan & Policy Committee, addressing economic, social, and environmental factors and adding a Regional Future Land Use Map (Introduction, pages 2-3).
- The Plan documents a coordinated, comprehensive planning process through a public participation program including engagement with all municipal Planning Commissions and most Selectboards, with 14 regional open houses, online tools, partner organization meetings, and incorporation of feedback into Plan revisions (Public Participation; Introduction, pages 11–13).
- The Plan provides a policy framework for intergovernmental decision-making via identified sections on compatibility with municipal plans, adjoining regional plans (The Plan in Context, pages 18–19), coordination with State Act 250 permitting (Land Use, page 116), and by sharing Act 250 Tier 1A/1B information with municipalities (Introduction, pages 12).

21. The Plan encourages citizen participation at all levels of the planning process, and includes assurance that decisions shall be made at the most local level possible commensurate with their impact, as follows:

- The Plan documents a public participation process that encouraged citizen involvement across the region, including 14 open houses, meetings with all municipal Planning Commissions and most Selectboards, online survey and map comment tools, and broad outreach (project website, newsletters, flyers, social media, Front Porch Forum) (Public Participation; Introduction, page 12).
- The Plan’s “Meaningful Participation and Collaboration” section shows measures to ensure participation at all levels, including plainly written materials, online and in-person engagement opportunities, and explicit identification of which decisions are influenced by public feedback versus those determined by statute or municipal authority, with documentation of how input was addressed (Introduction, pages 12-13).
- The Plan assures decisions are made at the most local level possible by noting NRPC has no taxing or regulatory authority (Introduction, page 2) and by collaborating with municipalities to revise the Regional Future Land Use Map based on local feedback where consistent with statutory definitions and plan goals (Incorporating Community Ideas; Introduction, page 13).

22. The Plan shows that the NRPC considered the use of resources and the consequences of growth and development for the region and the State, as well as the community in which it takes place, as follows:

- The Plan considers regional and community resource use and the consequences of growth through sections on Substantial Regional Impact and Cumulative Impacts (Putting the Plan Into Action, page 18), the Natural & Cultural Resources chapter with inventories and maps (e.g., Water Resources, Conserved Land, Wildlife Habitat) and the Land Use chapter with Current and Future Land Use and FLU descriptions (List of Maps; Natural & Cultural Resources, pages 89–102; Land Use, pages 104-116; Appendix III – Environmental Benefits & Burdens Analysis, pages 147–152).
- The Plan addresses State-level consequences by documenting compatibility with Title 24 V.S.A. Chapter 117 and Vermont planning goals (The Plan in Context, pages 18–19; Figure 5: Vermont Planning Goals), coordinating with State Act 250 permitting (Land Use, page 116), and aligning energy policies with statewide greenhouse gas and Comprehensive Energy Plan targets via the Energy chapter and Regional Energy Plan (Energy, pages 34–39; Appendix II).

23. The Plan shows that NRPC encouraged and assisted municipalities to work creatively together to develop and implement plans, as follows:

- The Plan documents direct assistance and collaborative planning with municipalities by meeting with all municipal Planning Commissions and most Selectboards, collaborating with municipalities to revise the Regional Future Land Use Map, and providing Act 250 Tier 1A/1B information to eligible municipalities (Public Participation; Meaningful Participation and Collaboration; Incorporating Community Ideas — Introduction, pages 12–13).
- The Plan establishes an implementation framework that supports inter-municipal cooperation through “Putting the Plan Into Action” (including Implementation Tables, Table 4, pages 16–17) and emphasizes NRPC services for local capacity, education, training, and project implementation, while aligning plans with adjoining regions (Introduction, pages 1-3, Putting the Plan Into Action, page 13; The Plan in Context, pages 18–19).

Based on the above findings, the Board concludes that the Plan is consistent with the state planning goal of 24 V.S.A. § 4302(b).

c. Consistency with 24 V.S.A. § 4302(c)

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

The Board has evaluated the Plan for determination of compliance with the goals of 24 V.S.A. 4302(c), and provides its findings under each goal.

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). Specifically,

To plan development so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside.

(A) Intensive residential development should be encouraged primarily in downtown centers, village centers, planned growth areas, and village areas as described in section 4348a of this title, and strip development along highways should be avoided. These areas should be planned so as to accommodate a substantial majority of housing needed to reach the housing targets developed for each region pursuant to subdivision 4348a(a)(9) of this title.

(B) Economic growth should be encouraged in locally and regionally designated growth areas, employed to revitalize existing village and urban centers, or both.

(C) Public investments, including the construction or expansion of infrastructure, should reinforce the planned growth patterns of the area.

(D) Development should be undertaken in accordance with smart growth principles as defined in subdivision 2791(13) of this title.

24 V.S.A. § 4302(c)(1).

24. The Plan is consistent with planning development so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside, as follows:

- The Plan delineates Future Land Use (“FLU”) planning areas with mapping criteria for centers, planned growth areas (“PGA”s), and village areas, and provides maps of these areas—encouraging development in compact settlements while preserving rural countryside (Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical Region — Map 14: Northwest Region

Centers and Village Areas, page 111; Physical Region — Map 15: Northwest Region Centers and Planned Growth Areas, page 112).

- The Plan was developed in alignment with Vermont Planning Goals and through collaboration with municipalities to revise the FLU Map consistent with statutory definitions and plan goals, supporting maintenance of the historic settlement pattern (The Plan in Context, pages 18–19; Figure 5: Vermont Planning Goals, page 19; Introduction, pages 12–13).
- Concentrating development in these growth areas works in concert with maintaining rural working lands and conserving forests, wildlife habitat, and other natural resources outside of concentrated growth centers.
- Transition/Infill Areas and Enterprise Areas are proposed for specialized growth or redevelopment in and around compact settlements, complementing centers, PGAs, and village areas (Land Use — Transition/Infill Areas purpose statement, page 114).

25. The Plan encourages intensive residential development primarily in downtown centers, village centers, PGAs, and village areas as described in section 4348a of this title, whereby these areas should be planned so as to accommodate a substantial majority of housing needed to reach the housing targets developed for each region pursuant to subdivision 4348a(a)(9) of this title, as follows. The Plan also discourages avoidance of strip development along highways, as follows:

- The Plan conforms to 24 V.S.A. § 4348a by establishing a regional FLU Map and delineating centers, village areas, and PGAs with explicit mapping criteria and maps, guiding where higher-density residential development should occur (Introduction, page 3; Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical Region — Map 14: Northwest Region Centers and Village Areas, page 111; Physical Region — Map 15: Northwest Region Centers and Planned Growth Areas, page 112).
- The Housing chapter sets Municipal Housing Targets and details “Housing Targets by Price, Size, Type and Land Use Area,” linking housing needs to designated land use areas (e.g., centers and PGAs) and planning for these areas to accommodate the housing needed to reach regional targets (Housing, pages 57, 59; Land Use — Designated Areas, page 115).
- Strip development is specifically discouraged or not allowed in Transitional Areas and Rural General Areas, reinforcing corridor design and development patterns that support compact centers (Land Use — Transition/Infill Areas purpose statement, page 114; Land Use — Rural General Areas).

26. The Plan encourages economic growth in locally and regionally designated growth areas, employed to revitalize existing village and urban centers, or both, as follows:

- The Plan directs economic growth to locally and regionally designated growth areas by delineating Centers, PGAs, and Village Areas with mapping criteria and maps, and by identifying State “Designated Areas” (Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical Region — Map 14: Northwest Region Centers and Village Areas, page 111; Physical Region — Map 15: Northwest Region Centers and Planned Growth Areas, page 112; Land Use — Table 6: State Designations, page 115).
- The Plan encourages revitalization of existing village and urban centers through Economic Development policies and initiatives including Brownfield Redevelopment, Industrial and Commercial Development, Tourism, and the Arts, Culture, and the Creative Economy (Economic Development, pages 21–27; Brownfield Redevelopment, page 24; Arts, Culture, and the Creative Economy, page 26).
- The Plan consistently encourages economic growth to primarily occur in downtown and village centers and surrounding PGAs and village areas; Transition/Infill Areas and Enterprise Areas are used for specialized growth or redevelopment in locations that reinforce compact centers and avoid dispersed rural development (Land Use — Transition/Infill Areas purpose statement, page 114).

27. Public investments, including the construction or expansion of infrastructure, reinforce the planned growth patterns of the area, under the Plan, as follows:

- The Plan aligns public infrastructure investments with planned growth patterns by delineating Centers, PGAs, Village Areas and State Designated Areas, and by planning for water, wastewater, stormwater, and solid waste systems, including mapping municipal sewer and water systems (Land Use, pages 104–116; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135–140; Physical Region — Map 17: Municipal Sewer and Water Systems, page 136).
- The Plan reinforces growth patterns through defined implementation actions and transportation investment policies, including Complete Streets and project priorities that guide where improvements occur and support centers and planned growth areas (Putting the Plan Into Action, pages 13–17; Transportation, pages 70–87).
- Land Use Policy 1d prioritizes public investments that will promote expansion in downtown and village centers, PGAs, and village areas and will not encourage

the development and/or fragmentation of farmlands or other resource areas, including investments in public facilities and the construction or expansion of infrastructure (Land Use — Policy 1d, page 117).

28. The Plan supports development to be undertaken in accordance with smart growth principles as defined in subdivision 2791(13) of this title, as follows:

- The Plan concentrates development in compact settlements by delineating and mapping Centers, PGAs, and Village Areas under explicit mapping criteria, future land use planning areas, and state designated areas—supporting smart growth’s focus on historic settlement patterns and efficient land use (Land Use, pages 104–116; Physical Region — Figure 4: Center, Planned Growth Area and Village Area Mapping Criteria, page 113; Physical Region — Map 14: Northwest Region Centers and Village Areas, page 111; Physical Region — Map 15: Northwest Region Centers and Planned Growth Areas, page 112; Land Use — Designated Areas, page 115).
- The Plan aligns infrastructure and transportation investments with these growth areas through goals, policies, and implementation actions for water, wastewater, stormwater, solid waste, and Complete Streets—reinforcing smart growth principles of efficient public investment, multimodal access, and coordinated implementation (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135–140; Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Putting the Plan Into Action, pages 13–17; The Plan in Context, pages 18–19).
- “Smart growth,” as defined in 24 V.S.A., Chapter 76A, Section 2791(13), is explicitly employed as a tool to accomplish these aims; NRPC will help municipalities plan for smart growth within Transition/Infill Areas with the goal of creating the conditions needed for these areas to be classified as Planned Growth Areas (Land Use — Transition/Infill Areas purpose statement, page 114).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

29. The Plan supports a strong and diverse economy that provides satisfying and rewarding job opportunities, as follows:

- The Plan outlines a diverse economic base and strategies—including industrial and commercial development, brownfield redevelopment, the working landscape, tourism, and the arts/culture/creative economy, and housing—supported by goals and policies to expand opportunities (Economic Development, pages 21–27; Arts, Culture, and the Creative Economy, page 26; Brownfield Redevelopment, page 24).
- The Plan promotes satisfying and rewarding job opportunities through workforce-oriented investments and policies in post-secondary education and workforce development, childcare, telecommunications infrastructure, and broadband, with defined goals and policies (Post-Secondary Education, Child Care, Workforce & Telecommunications, pages 29–33; Broadband, pages 31–33; Economic Development — Goals and Policies, page 27).
- The Economic Development chapter establishes five specific goals with associated policies: (1) ensuring access to opportunities; (2) improving citizen and business health; (3) ensuring employee readiness; (4) ensuring access to funding, reasonable business costs, and available infrastructure; and (5) facilitating collaboration between counties to address common issues. The chapter includes a comprehensive evaluation of how each goal will be met and supported.
- The Plan identifies the Northern Vermont Economic Development District (EDD) (Map 1), recognized by the U.S. Economic Development Administration, which enables access to federal economic development grants and technical support. Managed by a consortium of regional planning commissions and regional development corporations, the EDD encompasses Lamoille County, the Northeast Kingdom, and the NRPC region, with NRPC serving as lead organization and fiscal agent. The district's Comprehensive Economic Development Strategy (CEDS) focuses on building a diverse economy, creating a competitive advantage for district businesses, and increasing the well-being of district communities.

30. The Plan maintains high environmental standards, as follows:

- The Plan sets comprehensive goals and policies for protecting natural and cultural resources and managing water quality through dedicated chapters and mapped inventories (Natural & Cultural Resources, pages 89–102; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135–140).
- The Natural and Cultural Resources chapter describes the region's traditionally agrarian, working landscape framed by the Green Mountains and Lake

Champlain, and sets three specific goals: protecting significant natural resources; protecting historic, archaeological, scenic, and aesthetic resources; and maintaining or improving the quality of surface waters and groundwater. The Plan highlights “a working landscape and agricultural economy that supports regional food systems and keeps rural lands undeveloped” as a key regional economic asset (page 22).

- The Plan aligns energy and climate actions with statewide greenhouse gas and Comprehensive Energy Plan targets and includes an Environmental Benefits & Burdens Analysis to identify and mitigate disproportionate impacts (Energy, pages 34–39; Appendix III – Environmental Benefits & Burdens Analysis, pages 147–152).

31. The Plan supports expansion of economic opportunities in areas with high unemployment or low per capita incomes, as follows:

- The Plan identifies and targets disadvantaged areas with high unemployment or low per capita income—specifically Richford and Montgomery (unemployment and low per capita income) and St. Albans Town/Western St. Albans City—through the Climate and Economic Justice Screening Tool and Social Vulnerability Index analyses, and states that transportation, economic development, and education goals and policies will mitigate disproportionate burdens and improve access to opportunity (Equitable Planning, pages 8–11; Vulnerable and Disadvantaged Communities, pages 10–11).
- The Plan expands economic opportunities via defined goals and policies for post-secondary education and workforce development, childcare, and broadband, together with economic development strategies (industrial/commercial development, brownfield redevelopment, working landscape, tourism, arts/creative economy) (Post-Secondary Education, Child Care, Workforce & Telecommunications, pages 29–33; Economic Development, pages 21–27).
- Policy 1b commits to expanding opportunities in areas with high unemployment or low per capita incomes, reinforcing targeted investment and program alignment.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

32. The Plan broadens access to educational and vocational training opportunities, as follows:

- The Plan sets goals and policies to expand post-secondary education and workforce development, supported by enabling investments in childcare and broadband (Post-Secondary Education, pages 29–33; Broadband, pages 31–33). Goal 1 of the Economic Infrastructure chapter focuses on the availability of workforce training and post-secondary education.
- The Plan broadens access through planning for education and library facilities with defined goals and policies, and addresses education access and quality under social determinants of health (Infrastructure: Education, Libraries & Recreation Facilities, pages 43–47; Community Health — Education Access and Quality, page 63).
- The Plan discusses existing educational and vocational training opportunities and regional policies to promote them, and identifies that the Franklin Grand Isle Workforce Investment Board is no longer supported by the State of Vermont, resulting in a more diffuse approach to workforce development and a need to grow instruction in basic skills and specific training and certifications.
- Training and education resources include the Vermont Training Program; vocational education at the Cold Hollow Career Center in Enosburg Falls and at several high schools; the Northwest Technical Center in St. Albans City (serving students in grades 10–12 and adults); the Community College of Vermont (St. Albans campus); and Vermont Adult Learning (nonprofit).
- Economic Development goals and policies 5, 5d, and 5g focus on collaboration between counties, support for economic development services, and working with regional partners to maintain and improve quality of life necessary to attract and retain the talented workforce required for a high-performance regional economy.

33. The Plan's access to educational and vocational training opportunities are sufficient to ensure the full realization of the abilities of all Vermonters, as follows:

- The Plan includes goals and policies to broaden access via post-secondary education and workforce development, child care, broadband, and planning for education and library facilities; (Post-Secondary Education, pages 29–33; Broadband, pages 31–33; Infrastructure: Education, Libraries & Recreation Facilities, pages 43–47).
- The Plan applies equity analyses and targets disadvantaged areas to mitigate disparities in access and outcomes (Equitable Planning, pages 8–11; Community Health — Education Access and Quality, page 63).

- The measures in the Plan support the full realization of the abilities of all Vermonters. Economic Development goals and policies 3 and 3c address employee readiness and create opportunities for students and adults to achieve economic success by entering careers in the trades and licensed trades.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

34. The Plan provides for safe, convenient, economic and energy efficient transportation systems that respect the integrity of natural environment, as follows:

- The Plan establishes a safe, convenient, economic, and energy-efficient transportation system through defined goals and policies, multimodal planning (public transit and active transportation), and Complete Streets implementation policies that guide street and investment decisions (Transportation, pages 70–87; Transportation — Public Transit, page 73; Transportation — Active Transportation, page 77; Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Transportation — Project Priorities, page 85).
- The Plan respects the integrity of the natural environment by integrating greenhouse gas mitigation, adaptation, and resilience into transportation planning and coordinating transportation with land use and resource protection (Transportation — Climate Change: Greenhouse Gas Mitigation, Adaptation, and Resilience, page 85; Natural & Cultural Resources, pages 89–102; Land Use, pages 104–116; Appendix III – Environmental Benefits & Burdens Analysis, pages 147–152).
- The Transportation chapter advances equitable access to transportation, uses creative approaches, ensures climate resiliency, enhances quality of life, supports regional land use goals, and expands economic opportunities.
- The Transportation Planning element outlines the Transportation Planning Initiative, the Long-Range Transportation Plan, the Transportation Advisory Committee, and municipal Village Master Planning.

- The Plan references the VTrans Capital Program, updated annually, noting that many—but not all—regional priority projects are included; in 2021 VTrans implemented a new project selection and prioritization methodology (Vermont Project Selection and Prioritization).
- The Future Transportation Needs section addresses cost and access, survey results, climate change, and project priorities.
- Policy 3f requires that new land development not negatively impact the safety of any mode within the transportation network (Transportation — Policy 3f).

35. The Plan addresses public transit service, as follows:

- The Plan includes a Public Transit section and mapping of RCT Shuttle Routes, identifying available services and route coverage in the region (Public Transit, page 73; Physical Region — Map 3: RCT Shuttle Routes, page 74).

36. Transportation options in the Plan are mutually supportive, balanced, and integrated, as follows:

- The Plan presents a multimodal, integrated transportation system by addressing roadway, rail, freight, public transit, air, ferry, border crossings, intermodal facilities, and active transportation, with mapping of Transportation Facilities that demonstrates coordination across modes (Transportation, pages 70–87; Intermodal Facilities, page 76; Physical Region — Transportation Facilities, page 76). This includes state and local highways, bridges, three active rail lines, freight trucking, ferry services, eight border crossings, intermodal facilities such as park-and-ride lots, and active transportation elements such as shoulders, shared-use paths, sidewalks, and several rail trails.
- The Plan promotes mutually supportive and balanced options through Complete Streets implementation policies and commuting analysis that coordinate investments and design across modes to function cohesively (Transportation — Table 3: Implementation Policies for Complete Streets, pages 80–82; Commuting, page 78; Project Priorities, page 85).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

37. The Plan identifies, protects, and preserves important natural and historic features of the Vermont landscape as follows:

- The Plan identifies and protects significant natural and fragile areas through its Natural & Cultural Resources chapter and mapped inventories of conserved lands and wildlife habitat (Natural & Cultural Resources, pages 89–102; Physical Region — Map 10: Conserved Land, page 99; Physical Region — Map 11: Wildlife Habitat, page 101).
- The Plan identifies and addresses outstanding water resources via watershed and water resources mapping and analysis of major surface water stressors, with stormwater policies to maintain/improve water quality (Physical Region — Map 7: Northwest Region Watersheds, page 93; Physical Region — Map 9: Water Resources, page 98; Physical Region — Table 4: Major Surface Water Stressors, page 96; Infrastructure: Stormwater, pages 137–140).
- The Natural and Cultural Resources chapter includes substantive information and strategies that are relevant to and support this goal. The chapter goals and associated policies are (1) protect significant natural resources, including air, wetlands, wildlife, lakes, ponds, woodlands, earth resources, open spaces, groundwater resources and wildlife habitat; (2) protect and conserve historically significant buildings and locations, archaeological resources, and important scenic and aesthetic resources, starting with those identified in local and regional plans, and (3) maintain and wherever possible improve the quality of lakes, ponds, rivers, streams and groundwater and collectively address elements A-D of this goal (Natural & Cultural Resources, pages 89–102).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

38. The Plan supports maintenance and improvement in the quality of air, water, wildlife, forests, and other land resources, according to the principles set forth in 10 V.S.A. § 6086(a) as follows:

- The Plan sets goals/policies and provides inventories and maps for natural resources and water quality, including targeted impaired areas, water resources, conserved lands, and wildlife habitat (Natural & Cultural Resources, pages 89–102; Physical Region — Map 8: Targeted Impaired Areas, page 95; Physical Region — Map 9: Water Resources, page 98; Physical Region — Map 10: Conserved Land, page 99; Physical Region — Map 11: Wildlife Habitat, page 101; Physical Region — Table 4: Major Surface Water Stressors, page 96).
- The Plan addresses environmental quality through infrastructure planning and policies for water supply, wastewater, stormwater, and solid waste (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135–140).
- The Plan includes “Coordination with State Act 250 Permitting,” indicating consideration of state resource-protection principles applied in Act 250 review (Land Use — Coordination with State Act 250 Permitting, page 116).
- The Plan encourages land use through FLU mapping and criteria, providing a framework to manage development impacts on natural resources (Land Use, pages 104–116).
- Policies 1a–h in the Natural & Cultural Resources chapter specify actions to protect air, water, wildlife, mineral, and land resources from adverse development impacts.

39. The Plan articulates how 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 as follows:

- Basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253 address water resource designation, sources of pollution, protection strategies, funding and resources, and implementation.

- The Plan articulates water quality management via identification of major surface water stressors and underlying causes, watershed mapping, and stormwater policies; such elements are consistent with basin plans established under 10 V.S.A. § 1253 (Physical Region — Map 7: Northwest Region Watersheds, page 93; Physical Region — Table 4: Major Surface Water Stressors, page 96; Infrastructure: Stormwater, pages 137–140).
- The Plan references the Missisquoi, Champlain, and Lamoille Tactical Basin Plans and incorporates specific language from the Missisquoi Basin Plan addressing agricultural runoff and on-site septic systems.
- Policies 3a–e include specific actions to maintain and improve water quality in alignment with the basin plans.

40. Under the Plan, forestlands are to be managed to maintain and improve forest blocks and habitat connectors as follows:

- The Plan includes dedicated sections and mapping for “Forestland, Wildlife Habitat and Natural Areas” and regional wildlife habitat, supporting management of forest blocks and connectors (Land Use — Forestland, Wildlife Habitat and Natural Areas, page 107; Physical Region — Map 11: Wildlife Habitat, page 101).
- FLU mapping and Rural FLU mapping criteria guide conservation of rural landscapes where forest blocks and habitat connections are maintained (Land Use — Future Land Use Planning Areas, pages 109–114; Physical Region — Figure 5: Rural Future Land Use (FLU) Planning Area Mapping Criteria, page 114).
- Policy 1e directs development to avoid fragmentation of and adverse impacts to identified natural areas, forest blocks, critical wildlife habitat, and connectivity areas.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(6).

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).

41. The Plan makes efficient use of energy, provides for the development of renewable energy resources, and reduces emissions of greenhouse gases as follows:

- The Energy chapter sets future targets, guiding policy statements, and goals and policies for energy conservation and energy generation, and references statewide greenhouse gas and Comprehensive Energy Plan goals—supporting efficient energy use, renewable development, and emissions reduction (Energy, pages 34–39; Energy — Figure 2: State and Greenhouse Gas Emission Goals, page 35; Energy — Figure 3: State Comprehensive Energy Plan Goals, page 35).
- The Energy chapter outlines regional assets and opportunities, current energy use and generation, future targets (energy conservation and generation), challenges and opportunities, equity and affordability, and detailed goals and policies.
- The Regional Energy Plan provides an additional framework to encourage renewable resource development and efficiency (Appendix II – Northwest Regional Energy Plan, page 146) and identifies areas suitable for renewable energy generation; areas suitable for renewable development are also identified in the body of the Energy chapter.

42. The Plan’s 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 as follows:

- The Plan advances building energy efficiency through energy conservation policies and identifies renewable generation potential via regional generation capacity and energy generation policies (Energy, pages 34–39; Energy — Figure 4: Regional Generation Capacity, page 36) and identifies areas suitable for renewable energy generation in the Regional Enhanced Energy Plan and the Energy chapter.
- The Plan reduces transportation energy demand and single-occupancy vehicle use through FLU mapping, Complete Streets implementation policies, multimodal planning (public transit, active transportation), and transportation greenhouse gas mitigation strategies (Transportation — Table 3: Implementation Policies for

Complete Streets, pages 80–82; Public Transit, page 73; Active Transportation, page 77; Climate Change: Greenhouse Gas Mitigation, Adaptation, and Resilience, page 85).

- The Plan sets a goal to “hold vehicle miles traveled (VMT) per capita to 2011 levels” by reducing single-occupancy commuting, increasing walking/biking/transit, and focusing development in/near downtowns and village centers. (Energy, pages 34-41)

43. The Plan’s specific strategies and recommendations for achieving these goals are identified in the State energy plans prepared under 30 V.S.A. §§ 202 and 202b as follows:

- The Plan includes a regional energy plan (Appendix II – Northwest Regional Energy Plan, page 146) that serves as the region’s Enhanced Energy Plan.
- The Plan references and aligns with the state comprehensive energy plan goals and statewide greenhouse gas emission goals in the Energy chapter (Energy — Figure 3: State Comprehensive Energy Plan Goals, page 35; Energy — Figure 2: State and Greenhouse Gas Emission Goals, page 35).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

44. The Plan maintains and enhances recreational opportunities for Vermont residents and visitors as follows:

- The Plan includes a recreation section with defined goals and policies, and maps regional facilities and trails, indicating active planning to maintain and enhance recreation for residents and visitors (Infrastructure: Education, Libraries & Recreation Facilities, pages 43–47; Map 2: Northwest Region Facilities, page 45; Map 3: Northwest Region Trails, page 46).
- Recreation is also promoted and protected through goals and policies in the Housing and Community Health chapters.

- The Transportation chapter identifies active transportation facilities—including three rail trails, other local trails, and public sidewalks—and includes a tabulated inventory.

45. Planned growth will not significantly diminish the value and availability of outdoor recreational activities as follows:

- The Plan encourages development in Centers, PGAs, and Village Areas with mapped criteria, helping to conserve rural countryside and natural areas that support outdoor recreation, and also maps conserved lands (Land Use, pages 104–116; Figure 5: Rural Future Land Use (FLU) Planning Area Mapping Criteria, page 114; Map 10: Conserved Land, page 99).
- The Housing chapter includes a policy to site new rural housing developments to preserve the greatest amount of open space possible, with open space retained for agriculture, forestry, recreation, or resource preservation.

46. The Plan includes public access to noncommercial outdoor recreational opportunities, such as lakes and hiking trails, should be identified, provided, and protected wherever appropriate as follows:

- The Plan directs development to Centers, PGAs, and Village Areas with mapped criteria, helping to conserve rural countryside and natural areas that support outdoor recreation, and maps conserved lands (Land Use, pages 104–116).
- The Plan includes a recreation section with defined goals and policies, and maps regional facilities and trails, indicating active planning to maintain and enhance recreation for residents and visitors (Infrastructure: Education, Libraries & Recreation Facilities, pages 43–47; Map 2: Northwest Region Facilities, page 45; Map 3: Northwest Region Trails, page 46).
- The Community Health chapter promotes outdoor physical activity by improving bike and pedestrian access to schools and recreation facilities and by expanding bike path and sidewalk networks.
- The Community Health chapter also includes a policy to include walking paths, sidewalks, biking paths, and recreation opportunities in larger projects that meet the definition of having significant regional impact.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

47. The Plan encourages and strengthens agricultural and forest industries as follows:

- The Plan encourages strengthening of agricultural and forestry economies through dedicated sections on the “Working Landscape” within Economic Development and on “Farms and Farmland” and “Forestland, Wildlife Habitat and Natural Areas,” supported by land use policies and FLU mapping (Economic Development, page 24; Land Use, pages 104–116; Natural & Cultural Resources, pages 89–102).
- The Land Use chapter includes Goal 2, which pertains to forest health and diversity, conservation, and the working landscape of agriculture and forestry.
- The forest resources section recognizes the important role of forests and forest products as a vital component of the local economy. Franklin County is identified as the second most productive agricultural county in Vermont, generating 24% of the state’s farm sales in 2022, and roughly half of the region’s land area is forested.

48. The Plan’s strategies that protect long-term viability of agricultural and forestlands are encouraged and include maintaining low overall density, as follows:

- The Plan directs growth to Centers, PGAs, and Village Areas using mapped criteria, preserving rural countryside and supporting low overall density in agricultural and forest areas; it includes specific sections on farms and forestland (Land Use, pages 104–116; Physical Region — Figure 5: Rural Future Land Use (FLU) Planning Area Mapping Criteria, page 114; Land Use — Farms and Farmland, page 106; Land Use — Forestland, Wildlife Habitat and Natural Areas, page 107).

- The Agriculture and Forestry FLU area includes blocks of forest or farmland that “contribute to economic well-being and quality of life. Development in these areas shall be carefully managed to promote the working landscape and rural economy, while protecting the agricultural and forest resource value” (Land Use, page 110).

49. The Plan encourages manufacture and marketing of value-added agricultural and forest products as follows:

- The Economic Development chapter includes “Industrial and Commercial Development” and “Working Landscape,” which give attention to agricultural/forestry-related economic activities and facilities that can support value-added production (Economic Development, pages 24–26).

50. The Plan encourages the use of locally-grown food products as follows:

- Policies specific to working lands include 2a which supports production, marketing and access to local products, and 2c which supports efforts to ensure that the working landscape—including agriculture, forestry, and value-added production—remains a key sector in the region’s economy. (Economic Development, pages 21–27).

51. The Plan encourages sound forest and agricultural management practice as follows:

- The Plan includes dedicated sections and mapped inventories for forestland and natural areas, supporting management and conservation of forest and agricultural resources (Natural & Cultural Resources, pages 89–102; Land Use — Forestland, Wildlife Habitat and Natural Areas, page 107; Physical Region — Map 11: Wildlife Habitat, page 101).
- Agricultural management practices to improve soil health and prevent water quality issues are discussed in the Natural & Cultural Resources chapter.
- The Plan maps agricultural and forestry soils to inform conservation and management actions (Physical Region — Map 6: Agricultural and Forestry Soils, page 92).

52. The Plan supports public investment planning so as to minimize development pressure on agricultural and forest land as follows:

- Public investments in infrastructure are supported and aligned with mapped centers and PGAs and existing/proposed water and wastewater systems, reinforcing and encouraging growth in designated areas and minimizing or reducing pressure on rural agricultural and forest lands (Land Use, pages 104–116; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste,

pages 135–140; Physical Region — Map 17: Municipal Sewer and Water Systems, page 136).

- Land Use Policy 1d prioritizes public investments that will promote expansion in designated centers and discourage the development or fragmentation of farmlands and other resource areas.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

53. The Plan provides for the wise and efficient use of Vermont’s natural resources and facilitates the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetic qualities of the area as follows:

- The Plan concentrates growth in Centers, PGAs and Village Areas and maps extensive Rural: Agriculture & Forestry and Rural: Conservation areas to avoid fragmentation of forest blocks, wildlife habitat, wetlands and water resources—ensuring wise, efficient use of natural resources. (Land Use, pages 108-114; Natural & Cultural Resources, pages 102-103). It also seeks to minimize adverse impacts on existing or planned uses within the vicinity of such projects.
- The Plan explicitly requires mineral and earth resource extraction and processing facilities to be planned, constructed and managed to limit negative impacts, ensure rehabilitation, minimize noise, protect wildlife habitat, water quality and prime agricultural soils, and avoid interference with transportation system safety. (Natural & Cultural Resources, pages 102-103).
- The Plan preserves aesthetic qualities by protecting scenic resources and requiring context-sensitive siting: ridgeline/hilltop development must fit the landscape; communications and energy facilities must minimize visual impacts (with co-location preferred); and new development must respect the character of the area’s built environment. (Natural & Cultural Resources, pages 102-103; Land Use, pages 116-117).
- The Natural & Cultural Resources chapter includes Goal 1: “Protect significant natural resources, including air, wetlands, wildlife, lakes, ponds, woodlands, earth resources ...,” supported by Policy 1c to plan, construct, and manage

mineral and earth resource extraction and processing facilities so that negative impacts are limited and rehabilitation is certain.

- The chapter's "Other Earth Resources" section identifies specific resources in the region, such as Isle La Motte's high-quality black marble.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(10).

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).

54. The Plan ensures the availability of safe and affordable housing for all Vermonters, and satisfied elements A to D of Goal 11 as follows:

- The Plan sets regional and municipal housing targets (2,144–3,249 new homes by 2030; 6,755–13,315 by 2050), commits to "build and improve more homes so that high-quality, safe, and affordable housing options are equitably available," and maps growth areas sized to accommodate a substantial majority of targets. (Housing, pages 57-61; Land Use, pages 108-116). It also establishes an affordability goal that households spend no more than 30% of income on housing and no more than 15% on transportation, and identifies strategies including multiunit and infrastructure development in planned growth areas, encouraging ADUs, rehabilitation of substandard housing, expansion of perpetual/guaranteed affordability programs, and workforce development to raise household incomes.
- Concerning element (A), the Plan targets production by price, size, type and location; prioritizes severely cost-burdened households, BIPOC households,

seniors and young adults; and advances mixed-income developments, perpetual affordability, vouchers and other affordability tools, consistent with statutory housing targets and municipal allocations. (Housing, pages 57-60). The “Household Income, Housing Cost and Affordability” section addresses needs for low- and moderate-income households, and the Housing Targets section includes specific targets for affordable units. Housing Policy 1c promotes mixed-income Affordable Housing Developments with at least 20% affordable units or a minimum of 5 affordable units as defined by Vermont statute, and Policy 1d supports perpetual affordability for new affordable housing.

- Concerning element (B), the Plan calls for improving substandard units to meet codes; focusing new housing in centers, village areas, and PGAs, with access to jobs, services and transit; and investing in water/wastewater and shared infrastructure in these areas to support higher-density housing. (Housing, pages 60-61; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141; Transportation, pages 70-78). Housing Policy 2a promotes efficient design to conserve energy and minimize the financial impact of expanded municipal services.
- Concerning element (C), the Plan encourages intensive residential uses—including multifamily, assisted living and group homes—in the same centers and neighborhoods planned for residential growth, facilitates these sites via designated areas and Act 250 Tier 1A/1B exemptions, and promotes zoning changes to integrate diverse housing types into existing neighborhoods. (Housing, pages 59-61; Land Use, pages 108-116). Housing Policy 1f specifically promotes zoning changes that integrate diverse housing types into existing neighborhoods.
- Concerning element (D), the Plan explicitly recommends “flexibility and incentives for construction of Accessory Dwelling units” and promotes zoning changes to integrate accessory apartments within existing neighborhoods to expand affordable options near care and services. (Housing, pages 59-61). ADUs are identified under Housing Policy 1f and further supported under “Strategies to Address Housing Needs.”

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(11).

Goal 12:

The twelfth goal requires the 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).

55. The Plan supports financing and provision of an efficient system of public facilities and services to meet future needs as follows:

- The Plan establishes an implementation program (governance/shared services, coordination with state/regional entities, annual work program), prioritizes capital investments with VPSP2 (Vermont Project Selection and Prioritization, used by VTrans) to prioritize transportation projects for capital planning), and sets goals and policies for efficient water, wastewater, stormwater, and solid-waste systems guided by long-range facility plans and capital budgets. (Putting the Plan into Action, pages 13-18; Transportation, pages 85-87; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141)
- Concerning element (A) “Public facilities and services should include fire and police protection, emergency medical services, schools, water supply, and sewage and solid waste disposal.”, the Plan addresses each: it emphasizes planning and financing for fire/police/EMS with mutual aid and sustainable funding mechanisms; ensures schools and libraries are high-quality and sited in centers; and provides detailed goals, capacity assessments, and funding pathways for water supply, wastewater, stormwater, and solid waste. (Disaster Resilience, pages 119-121; Infrastructure: Education, Libraries & Recreation Facilities, pages 43-48; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141). The Disaster Resilience chapter addresses fire, police, and emergency medical services across mitigation, preparedness, response, and recovery. The Plan also supports high-quality educational and vocational opportunities and a regional network of community libraries.
- Concerning element (B) “The rate of growth should not exceed the ability of the community and the area to provide facilities and services.”, the Plan states this policy explicitly; it encourages concentration of growth in Centers, PGAs and Village Areas coordinated with existing infrastructure, supports efficient design to minimize municipal service impacts, and uses cumulative-impact review with cost-sharing to ensure capacity keeps pace with development. (Disaster Resilience, pages 133-134; Land Use, pages 108-116; Housing, pages 60-61; Putting the Plan into Action, pages 18).
- The Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste chapter assesses existing and future needs and highlights significant

infrastructure investments—particularly to support needed housing—while embedding goals and policies to protect water supplies and maintain cost-effective, environmentally sound systems. The Plan emphasizes that well-planned and well-financed infrastructure is essential for municipalities to plan development in advance and notes NRPC assistance for planning in Transition/Infill Future Land Use areas.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

56. The Plan is consistent with Goal 13 as follows:

- The Plan expressly adopts the goal “to ensure the availability of safe and affordable child care and [to] integrate child care needs into the planning process, including child care financing, infrastructure, business assistance for child care providers, and child care work force development,” and implements it by directing municipalities to inventory future need and supply, remove local barriers, authorize child care in convenient locations, and promote employer–school–community collaboration to deliver affordable, quality care. (Economic Infrastructure: Post-Secondary Education, Child Care, Workforce & Telecommunications, pages 29-33). Implementation measures also include supporting child care financing and infrastructure, providing business assistance for child care providers, and advancing child care workforce development, consistent with 24 V.S.A. § 4302(c)(13).
- The Plan documents the regional child care shortfall and affordability gap—average weekly costs below statewide but still unaffordable for many, and an estimated ~1,000 additional children who could be served if capacity existed, especially for infants and toddlers—and uses these findings to guide siting and programmatic actions that integrate child care with land use and economic development. (Economic Infrastructure: Post-Secondary Education, Child Care, Workforce & Telecommunications, pages 31-33)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(13).

Goal 14:

The fourteenth goal requires the plan to encourage flood resilient communities.

24 V.S.A. § 4302(c)(14).

57. The Plan is consistent with Goal 14 as follows:

- The Plan directs land use and hazard policies to reduce flood risk: it discourages new development in flood hazard, fluvial erosion and river corridor areas (except in mapped growth areas), requires that any new development not exacerbate flooding, supports elevating/relocating/retrofitting vulnerable buildings and infrastructure, maintains National Flood Insurance Program (“NFIP”) standing, protects/restores floodplains and upland forests, and includes river corridor protection recognized in statute. (Disaster Resilience, pages 122-124, 133-134; Natural & Cultural Resources, pages 93-95, 103). Natural Resources Goal 1d ensures that development in floodplain and river corridor areas does not impede the flow of floodwaters or endanger public health, safety, and welfare; Disaster Resilience Policy 1f requires that new development in flood hazard and river corridor protection areas must not exacerbate flooding and fluvial erosion; and the Plan includes mapping of regional river corridors.
- The Plan strengthens stormwater and infrastructure resilience to flooding by encouraging low-impact development and green stormwater infrastructure, addressing cumulative impacts, implementing MS4 and municipal road erosion measures, promoting vegetative riparian buffers, and prioritizing right-sized culverts and climate-resilient designs through capital planning and project selection. (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 137-140; Transportation, pages 85-87; Natural & Cultural Resources, pages 94-95)
- All municipalities in the region are enrolled in NFIP; many NFIP (flood hazard area) maps are 40+ years old and are being updated, with NRPC assisting its towns on bylaw updates. The Plan’s resilience policies also call for communities to maintain good standing in NFIP. (Natural & Cultural Resources, pages 93-95; Disaster Resilience, pages 133-134). The Natural & Cultural Resources chapter’s Rivers and Watersheds section discusses FEMA flood hazard mapping and flood hazard regulations.
- The Disaster Resilience chapter includes emergency preparedness; support for volunteers and mutual aid agreements; and use of the Municipal Vulnerability Tool. It addresses fire, police, and emergency medical services and covers mitigation, preparedness, response, and recovery. Flooding and fluvial erosion are listed as High Risk Hazards, and the Plan identifies the greatest risk to the region as flooding in the form of inundation and fluvial erosion. Policy 1d calls for all municipalities and major employers to maintain flood emergency

preparedness and all-hazards preparedness and response plans with a focus on the most vulnerable populations.

- The Plan notes that this goal language is effective until January 1, 2028, after which it will be updated to reflect statewide minimum flood hazard area standards established by rule by the Agency of Natural Resources.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(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).

58. The Plan is consistent with Goal 15 as follows:

- Concerning equitable distribution of environmental benefits and burdens, the Plan includes an Environmental Justice analysis under 3 V.S.A. chapter 72, mapping environmental justice focus populations, evaluating 19 benefits/burdens, identifying six disproportionate impacts (e.g., air quality, green space access, flooding/stormwater, erosion, water pollution), and stating that the Plan’s goals and policies are adjusted to mitigate these burdens and repair inequities; equity is further embedded in sector policies (e.g., energy “Just Transition”). (Equitable Planning, pages 8-10; Appendix III – Environmental Benefits & Burdens Analysis, pages 147-149; Energy, pages 38-39). Table 3

identifies the six disproportionate impacts, which include climate change impacts in addition to the categories noted above. Initially, EJ focus populations were mapped per 3 V.S.A. § 6002, but to better detect disproportionate impacts NRPC used a modified threshold for analysis, flagging block groups where more than 10% of residents are Persons of Color or Indigenous People.

- Concerning “meaningful participation”, the Plan adopts the statutory definition of meaningful participation (3 V.S.A. § 6002), commits to providing opportunities for all individuals—especially environmental justice focus populations—to participate in planning and decision making, and adopted a Public Participation Policy (2024) to ensure inclusive, transparent input into regional policies and implementation. (Public Participation, pages 11-12; Putting the Plan into Action, pages 14-15). The Equitable Planning section of the Introduction describes NRPC’s equity approach, which was broadened in 2021 and guided by a Board-adopted statement of inclusion in early 2022.
- NRPC held 14 open houses at community locations, provided an online survey and map-comment tool, met with all planning commissions and most selectboards, and engaged partner organizations; materials were in plain English, specified what decisions could be influenced, offered online sessions, and documented feedback and responses. (Public Participation, pages 11-13)
- In 2025 NRPC evaluated the Plan’s environmental justice benefits and burdens using state definitions and available data, compared outcomes to focus-population geographies, identified disproportionate impacts, and reviewed Plan goals/policies to mitigate them; ongoing consistency is supported by developing indicators, seeking public comment on them, and reporting progress at least annually. (Appendix III – Environmental Benefits & Burdens Analysis, pages 147-149; Putting the Plan into Action, pages 15). Vermont statute lists 36 example benefits/burdens; NRPC consolidated complementary items into single measures, mapped as many as data allowed, and noted that no data were available for nine measures. Table 2 documents the resulting goal/policy changes to mitigate disproportionate burdens. The Plan observes that other EJ methodologies could satisfy Goal 15, that its method could serve as a model for other regions (with all 36 statutory examples considered), and that Agency of Natural Resources rulemaking and mapping—refining EJ focus-population definitions and incorporating cumulative burdens—will likely warrant updating the analysis.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4302(c)(15).

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

As part of the Board's determination of compliance, the Board must determine whether the Plan is consistent with the purposes of the regional plan 24 V.S.A. § 4347. 24 V.S.A. 4348(h)(4)(B). Accordingly, section 4347 requires:

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.

To determine consistency, the Board applies the standard in 24 V.S.A. 4302(f)(1).

59. The Plan is consistent with the Purposes of a Regional Plan pursuant to 24 V.S.A. §4347 as follows:

- The Plan sets a regional vision and an implementation program (governance/shared services, coordination with state and regional entities, annual work program, indicators, and project review) to guide efficient, equitable development that promotes health, safety, prosperity, and welfare. (Plan Purpose and Vision, pages 2-3; Putting the Plan into Action, pages 13-18)
- The Plan maps FLU areas (Centers, PGAs, Village Areas, Enterprise, Rural: Agriculture & Forestry, Rural: Conservation, Rural: General) and allocates regional/municipal housing targets so a substantial majority of growth is

encouraged in compact, serviced places, with rural lands conserved. (Land Use, pages 108-116; Housing, pages 57-60)

- Concerning factor (1) above, the Plan advances multimodal, Complete Streets and transit investments; strengthens community health and safety through disaster resilience; and supports siting of schools and libraries in centers and growth areas, along with arts and creative-economy initiatives. (Transportation, pages 70-87; Community Health, pages 62-69; Infrastructure: Education, Libraries & Recreation Facilities, pages 43-48; Economic Development, pages 26-28)
- Concerning factor (2) above, the Plan encourages concentrated growth in Centers, PGAs, and Village Areas, sets Vehicle Miles Traveled (“VMT”)-reduction and mode-shift policies, and uses cumulative-impact review and master planning to avoid sprawl and inefficient infrastructure expansion. (Land Use, pages 108-117; Transportation, pages 85-87; Putting the Plan into Action, pages 18)
- Concerning factor (3) above, the Plan requires low-impact development and green stormwater infrastructure, plans and finances water/wastewater systems via long-range capital strategies, advances solid-waste reduction, and implements demand-side energy management and efficiency. (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141; Energy, pages 39-41)
- Concerning factor (4) above, the Plan protects prime agricultural soils and forest blocks, safeguards groundwater and surface waters, emphasizes energy conservation, and sets standards for responsible mineral/earth-resource activities. (Natural & Cultural Resources, pages 91-97, 102-103; Land Use, pages 111-114; Energy, pages 39-40)
- Concerning factor (5) above, the Plan supports the working landscape (agriculture, forestry, value-added production), encourages maintenance of Rural: Agriculture & Forestry areas, prescribes reasonable, mitigated earth-resource extraction, manages water resources, and supports expansion of appropriately sited renewable energy. (Economic Development – Working Landscape, pages 24-26; Land Use, pages 111-114; Natural & Cultural Resources, pages 102-103; Energy, pages 36-42)
- Concerning factor (6) above, the Plan adopts quantified regional and municipal housing targets, supports advancement of mixed-income and perpetually affordable housing, enables diverse types (e.g., multifamily, ADUs), and encourages new housing in serviced centers with coordinated water/wastewater investments. (Housing, pages 57-61; Land Use, pages 108-116; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141)

- Concerning factor (7) above, the Plan supports climate mitigation (mode shift, EV infrastructure, renewable generation); adaptation (floodplains, river corridors, right-sized culverts, Low Impact Design - which is a set of best management practices that manage stormwater at its source by infiltrating, filtering, storing, evaporating, and detaining runoff.); and equity (environmental justice assessment and Just Transition policies) to prioritize frontline communities. (Disaster Resilience, pages 130-134; Transportation, pages 85-87; Energy, pages 38-41; Equitable Planning, pages 8-10; Appendix III – Environmental Benefits & Burdens Analysis, pages 147-149)
- Concerning efficiency and economy in the process of development, by linking land use with transportation, utilities, and FLU mapping with Act 250 Tier 1A/1B tools, and by prioritizing projects with VPSP2 and regional input (through the Transportation Advisory Committee, or TAC), the Plan steers investment to places with existing capacity and reduces public costs. (Land Use, pages 115-116; Transportation, pages 85-87; Putting the Plan into Action, pages 13-18)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4347.

3. Consistency with the regional plan elements of 24 V.S.A. 4348a.

As part of the Board's determination of compliance, the Board must determine whether the Plan is consistent with the purposes of the regional plan elements of 24 V.S.A. § 4348a. Below is the Board's analysis and conclusions.

It is noted that 24 V.S.A. 24 V.S.A. § 4348a(a)(6) was repealed and was not evaluated.

a. 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).

60. The Plan contains 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, as follows:

- The Plan contains a clear statement of basic policies to guide future growth and land development through its FLU mapping and accompanying Land Use goals and policies that direct compact growth to Centers, PGAs and Village Areas while supporting conservation of rural working lands and sensitive resources. (Land Use, pages 108-116; Land Use, pages 116-117).

- The Plan states basic policies for public services and facilities and for environmental protection through dedicated Goals and Policies sections governing water, wastewater, stormwater and solid waste; and protection of natural and cultural resources, water quality, wildlife habitat and responsible earth resource use. (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 140-141; Natural & Cultural Resources, pages 102-103).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(1).

b. Natural Resources and Working Lands

A regional plan must include:

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).

61. The Plan has a natural resource and working lands element with maps and policies based on ecosystem function (core forests, habitat connectivity, riparian/wetland systems) and a FLU Map that supports compact Centers/Planned Growth Areas surrounded by Rural: Agriculture & Forestry and Rural: Conservation working lands. Areas of significant natural resources are depicted in the Natural & Cultural Resources chapter in Map 6 (Agricultural and Forestry Soils), Map 8 (Targeted Impaired Areas), Map 9 (Water Resources), Map 10 (Conserved Land), and Map 11 (Wildlife Habitat); FLU mapping addresses residential, commercial, industrial, public, and semipublic uses (Natural & Cultural Resources, pages 99-103; Land Use, pages 108-116)
62. The Plan identifies and maps significant natural resources and land uses, including forests, wetlands, floodplains, river corridors, wildlife habitat, conserved lands, agricultural and forestry soils, recreation areas/trails, groundwater/source protection areas, and the full range of residential, commercial, industrial, public and semipublic uses needing special consideration for aquifer, wetland, forest block, wildlife habitat, and habitat connector protection. The Plan addresses consideration of water quality and wetland protection, maintenance of forest blocks, wildlife habitat, and habitat connectors, and other conservation measures, as shown on Maps 6, 8, 9, 10, and 11. (Natural & Cultural Resources, pages 91-101, 93-98; Land Use, pages 108-116; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-136; Infrastructure: Education, Libraries & Recreation Facilities, pages 46-47)
63. The Plan designates extensive Rural: Agriculture & Forestry areas and recommends maintaining agricultural lands through limiting loss of prime soils, right-to-farm protections, support for accessory on-farm businesses, and explicit land protection tools including transfer and purchase of development rights and fee-simple acquisition, along with farmer assistance programs via the working landscape strategies. Agricultural soils are depicted and the Rural – Agriculture & Forestry FLU indicates areas planned to remain predominantly agricultural; Land Use Goal 2 (maintain a strong working agricultural landscape) and Policies 2a–h include specific actions to support this goal. (Land Use, pages 106-107, 116-117; Economic Development – Working Landscape, pages 24-26)
64. The Plan identifies forest blocks and habitat connectors (including highest-priority/core areas and connectivity blocks) and plans land development to avoid fragmentation and maintain forest ecological function, with policies supporting active management for wildlife habitat, water quality, timber production, and

recreation. Land Use Policy 2b states that development in forestry and conservation areas will not fragment high-priority forest and connectivity blocks or diminish the viability of woodland operations; forest and connectivity blocks are mapped on Map 11; and specific policies to encourage active management are listed in the Natural & Cultural Resources and Land Use chapters. (Natural & Cultural Resources, pages 99-101, 102-103; Land Use, pages 111-114, 116-117)

65. The Plan encourages preservation of rare and irreplaceable natural areas and scenic and historic resources through inventories (e.g., Fragile Areas Registry, rare/threatened species, historic districts) and policies requiring context-sensitive siting (e.g., ridgelines/hilltops), minimizing visual impacts of facilities, conserving historic buildings, and avoiding undue adverse aesthetic effects. These requirements are addressed via the Natural Resources chapter, Goals 1 to 3, and associated policies. (Natural & Cultural Resources, pages 89-92, 100-103; Land Use, pages 116-117)
66. The Plan encourages protection and improvement of State waters and aligns with Basin Plans by prioritizing river corridor protection, vegetated riparian buffers, wetland protection/restoration, stormwater LID/green infrastructure, MS4/road erosion compliance, and Clean Water Service Provider implementation in the Missisquoi and Lamoille Basins. The Missisquoi, Champlain, and Lamoille basin plans are referenced in the chapter text; specific language from the Missisquoi Basin Plan is included regarding agricultural runoff and on-site septic systems; and Policies 3a–e set specific actions to maintain and improve water quality. (Natural & Cultural Resources, pages 93-98; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 137-140)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(2).

c. Energy

A regional plan must include:

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(a)(3).

67. The Plan's energy element analyzes resources, needs, scarcities, costs, and problems across electric, thermal, and transportation (e.g., current use/generation trends; conservation and future targets; grid constraints in the Sheffield-Highgate Export Interface (a portion of the northern Vermont transmission grid); hydro environmental concerns; seasonal solar variability; equity/affordability), and states policies on conservation/efficient use and the development/siting of renewables through Guiding Policy Statements and detailed Goals & Policies for electricity, thermal efficiency, and transportation. (Energy, pages 34-41)
68. The Plan states a policy on patterns and densities of land use to conserve energy by focusing development in/near downtowns, growth centers, and village areas and by holding per-capita Vehicle Miles Travelled to 2011 levels, and it identifies potential and unsuitable areas for renewables via regional generation guidelines and maps (with known/possible constraints) and by finding industrial/commercial wind (tower >100 feet) not in conformance. (Energy, pages 36-41; Land Use, pages 108-116)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(3).

d. Transportation

A regional plan must include:

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).

69. The Plan's transportation element states present and prospective facilities across all modes and provides maps of existing facilities: public roadways including I-89, U.S./State Highways and NHS; sidewalks and bicycle/active transportation networks (e.g., Missisquoi Valley Rail Trail, Lamoille Valley Rail Trail); railroads and Amtrak service; transit routes and shuttle schedules; intermodal facilities including park-and-rides; airports; ferries; border crossings; and terminals, along with discussion of truck corridors and capacity concerns (e.g., VT 78 in Swanton/Islands, Exit 17 access). (Transportation, pages 70-77, 73, 75-76).
70. The Plan's transportation element is supported by three transportation goals and associated policies; Federal, State, and Interstate highways are shown (Map 1;

Table 1 shows road miles by type/character), transit routes are shown (Map 3), airports and railroads are mapped and discussed, and bicycle paths/trails are mapped in the Social Infrastructure chapter (Map 3).

71. The Plan includes recommendations to meet future needs with indications of priorities, costs, and financing through the VTrans Capital Program and the Vermont Project Selection and Prioritization Process ("VPSP2") prioritization process used by VTrans, Transportation Advisory Committee scoring and submittals, and policies to expand transit, Electric Vehicle charging, Complete Streets, and climate-resilient infrastructure; it also addresses funding approaches (e.g., equitable non-federal match for transit/routes) and project delivery methods. (Transportation, pages 84-87, 82-83)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(4).

e. Utility and Facility

A regional plan must include:

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).

72. The Plan contains a utility and facility element with maps and statements of present and prospective local and regional community facilities and public utilities, including: facilities and trails (Northwest Region Facilities; Trails), schools, libraries, and recreation; water and sewer system service areas; stormwater systems; solid waste transfer/recycling; hospital assets; power generation context and grid constraints; and broadband/telecommunications infrastructure and policies. (Infrastructure: Education, Libraries & Recreation Facilities, pages 43-47; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-139; Community Health, pages 67-68; Energy, pages 34-37; Economic Infrastructure: Broadband, pages 31-33)
73. The Plan provides recommendations to meet future needs, with priorities and methods of financing, including identified water and wastewater investment priorities (e.g., Highgate, South Hero/Keeler Bay, Georgia, St. Albans Town/City, Swanton),

Clean Water/USDA funding pathways, stormwater LID/green infrastructure actions, and goals and policies guiding future education, library, recreation, energy, and broadband facility investments. (Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 137-141; Infrastructure: Education, Libraries & Recreation Facilities, pages 47-48; Energy, pages 39-42; Economic Infrastructure: Broadband, pages 31-33)

74. Map 2: Northwest Region Facilities in the Social Infrastructure chapter shows municipal offices, state offices, courthouses, police stations, fire stations, healthcare facilities, schools, libraries, and waste transfer stations. Map 3 shows trails and recreational facilities. The Physical Infrastructure chapter discusses solid waste disposal and municipal water, sewer and storm drainage systems with maps where data is available. Energy generation facilities and transmission lines are mapped in the Energy Plan in Appendix II.
75. The Plan notes that solid waste from the region is shipped in bulk to the Coventry Landfill via transfer stations in Highgate and Williston. The Northwest Solid Waste District owns a 154-acre property in Sheldon intended to be used as a landfill site when existing landfill capacity is exhausted or export becomes less cost effective, and this landfill is partially permitted.

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(5).

f. Implementation

A regional plan must include:

“[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).

76. The Plan includes a program to implement the Plan’s objectives through a nine-part framework: governance/shared services; regional and local planning; coordination with state/regional entities; public participation; development review; an annual work program; measuring impact with indicators; and identified implementation priorities. An Implementation table is located in the Introduction and contains specific actions to implement the plan’s objectives. (Table 4). (Putting the Plan into Action, pages 13-18).
77. The Plan provides a recommended investment strategy based on capacity assessments of regional systems: transportation investments are prioritized via

VPSP2/TAC using condition and performance data (e.g., pavement/bridge condition) and Capital Program alignment; water/wastewater/stormwater/solid waste investments are guided by system capacities and future needs (e.g., identified municipal priorities, Clean Water/ United States Department of Agriculture (“USDA”) financing, Low Impact Development (“LID”) / Municipal Separate Storm Sewer System (“MS4”)/road erosion compliance). (Transportation, pages 70-72, 84-87; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 135-141).

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(7).

g. Compatibility with Other Plans

A regional plan must include:

“[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)

78. The Plan includes a clear statement of how it relates to development trends, needs, and adjacent plans: it documents regional development trends and needs in the Regional Profile, and in “The Plan in Context” it reviews and finds compatibility with plans of member municipalities and adjoining regions (Chittenden County Regional Planning Commission, Lamoille County Planning Commission, Northeastern Vermont Development Association), noting shared land use designations and cross-regional coordination (e.g., growth centers, rural/working lands, transportation corridors). No incompatibility was identified (Introduction, pages 3-7; The Plan in Context, pages 18-20)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(8).

h. Housing

The 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(c) 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).

79. The Plan contains a housing element which is consistent with the requirement of 24 V.S.A. § 4348a(a)(9), as follows:

- The Plan includes a dedicated Housing element with quantified regional and municipal targets (2,144–3,249 homes by 2030; 6,755–13,315 by 2050), current conditions, and policies to “build and improve more homes so that high-quality, safe, and affordable housing options are equitably available.” (Housing, pages 57-61)
- The Plan uses the 30% housing and 15% transportation affordability metrics, calls for improving substandard homes to meet state-recognized building codes, and supports RBES/CBES (state energy standards) enforcement; it also maps combined housing/transportation costs to guide location of new units. (Housing, pages 54-56, 60-61; Energy, pages 39-40; Introduction, page 7)
- The Plan analyzes household growth, tenure, cost burden, sale prices, unit types, seasonal stock, and unmet needs (7,600 households), and sets housing targets to meet those needs at both regional and municipal levels. (Housing, pages 49-58)
- The Plan expressly relies on the 2025 Vermont Housing Needs Assessment targets and translates them into regional ranges and municipal allocations. (Housing, pages 57-58)
- The Plan uses the Statewide Housing Needs Assessment (2025), NRPC's 2022 regional housing needs assessment, ACS demographics, incomes and poverty, sale prices, unit types, commuting, and cost burden; it also references locally gathered building permit data and related studies. (Housing, pages 49-58, 60-61). NRPC conducted its own 2022 Housing Needs Assessment, annually collects municipal building permit data, and maintains a Regional Housing

Dashboard to track new units and progress toward targets. (Housing, pages 49-50, 60-61)

- The Plan breaks targets down by price, size, type, and land use area; sets municipal targets (Table 2) and confirms mapped growth areas can accommodate a substantial majority of each municipality's target; and emphasizes quality by improving substandard units. (Housing, pages 57-60)
- The Plan recommends actions including producing 2–5 unit buildings in centers/growth areas, ADU flexibility and incentives, rehabilitation of substandard units, affordability programs, housing assistance and workforce development, and investments in water/sewer in designated areas; it also adopts detailed housing policies to implement these actions. (Housing, pages 59-61)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(9).

i. Economic Development

The 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).

80. The Plan contains an economic development element which is consistent with the requirement of 24 V.S.A. § 4348a(a)(10), as follows:

- The Plan includes an economic development element that describes present economic conditions, including regional assets and challenges, workforce trends, key industries (manufacturing, agriculture, health care, tourism, creative economy), and emerging pressures such as climate change and remote work. (Economic Development, pages 21-26)
- The Plan identifies the location, type, and scale of desired economic development by directing industrial and commercial growth to previously permitted industrial parks in or adjacent to downtowns and regional growth areas, supporting high-wage businesses in Enterprise Areas, and sustaining the working landscape and tourism in centers and rural areas consistent with land use goals. (Economic Development, pages 24, 27-28; Land Use, pages 114-116)
- The Plan sets policies, projects, and programs to foster growth, including NRPC's brownfields assessment/cleanup and revolving loan fund, workforce training and partnerships, expanding water/wastewater/broadband/cellular/energy infrastructure, regional marketing, support for mixed-income workforce housing,

and investments in local food, forestry, tourism, and the creative economy.
(Economic Development, pages 24-28; Economic Infrastructure, pages 29-33)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(10).

j. Flood Resilience

The 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).

81. The Plan contains a flood resilience element which is consistent with the requirement of 24 V.S.A. § 4348a(a)(11), as follows:

- The Plan includes a comprehensive Disaster Resilience section that explicitly serves as an all-hazards and flood resilience element, addressing flooding, fluvial erosion, climate impacts, critical facilities, and mitigation, preparedness, response, and recovery. (Disaster Resilience, pages 118-124, 130-134)
- A flood resilience element is integrated with Natural & Cultural Resources and Infrastructure chapters through mapped river corridors, flood hazard discussions, riparian buffers, wetlands, upland forests, and stormwater/LID practices that reduce flood risk to people and investments. (Natural & Cultural Resources, pages 93-95; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 137-140)
- The Plan identifies flooding and fluvial erosion as the region's highest risk, incorporates ANR river corridor protection, and includes a River Corridors map; it also addresses FEMA NFIP mapping and pending updates. (Disaster Resilience, pages 122-124; Natural & Cultural Resources, pages 93-95)

- The Plan designates and prioritizes protection of river corridors and floodplains, vegetated riparian buffers, wetlands, and upland forests (including within Rural – Conservation areas) to attenuate floods and fluvial erosion. (Natural & Cultural Resources, pages 93-95, 102-103; Land Use, pages 112-114)
- The Plan discourages new development in flood hazard/river corridor areas, prescribes that new development not exacerbate flooding, supports elevating/relocating/retrofitting vulnerable structures and right-sizing culverts, maintains and encourages NFIP standings, protects/restores floodplains and upland forests, and encourages Low Impact Design (LID)/green stormwater infrastructure and MS4/road erosion compliance. (Disaster Resilience, pages 133-134; Infrastructure: Water Supply, Wastewater, Stormwater & Solid Waste, pages 137-140; Natural & Cultural Resources, pages 94-95)
- The Plan employs a FEMA-approved Hazard Identification Risk Assessment (HIRA) process and relies on municipal Local Hazard Mitigation Plans and Emergency Operations Plans; it does not explicitly reference a FEMA-approved regional hazard mitigation plan. (Disaster Resilience, pages 119-121)

Based on the above findings, the Board concludes that the Plan is consistent with 24 V.S.A. § 4348a(a)(11).

C. FUTURE LAND USE AREA DESIGNATIONS

Consistency with the Future Land Use Areas

The 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).

Downtown Centers and Village Centers

Downtown and village centers 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).

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 this 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).

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).

Transition or infill areas

(D) Transition or infill area. These areas include areas 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).

Resource-based recreation areas

(E) Resource-based recreation areas. These areas include 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).

Enterprise areas

(F) Enterprise areas. These areas include 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).

Hamlets

(G) Hamlets. 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).

Rural; general

(H) 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

(I) 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

(J) 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. Any portion of this area that is approved by the LURB as having Tier 3 area status shall be identified on the future land use map as an overlay upon approval.

24 V.S.A. §4348a(a)(12)(J).

82. The Plan includes a future land use element that sets forth the present and prospective location, amount, intensity, and character of land uses in relation to needed facilities and services by mapping Future Land Use Planning Areas (Centers, PGAs, Village Areas, Transitional, Enterprise, Rural: Agriculture & Forestry, Rural: Conservation, Rural: General), delineating boundaries (Map 13; Maps 14–15; GIS FLU mapping), providing descriptions (Table 5), and linking higher-intensity growth to areas with existing or planned water/wastewater and transit while limiting development in resource areas. (Land Use, pages 108-116)
83. The Plan provides policies to implement the future land use element, including goals directing compact, mixed-use growth to mapped Centers/PGA/Village Areas, conserving rural working lands and sensitive resources, and coordinating with state designated areas and Act 250 Tier 1A/1B to align development with infrastructure capacity. (Land Use, pages 116-117)
84. The Plan includes a Future Land Use Map (“FLU Map”) which delineates the location, extent and boundary of each of the FLU Map categories of the future land use element of the Plan.
85. The FLU Map was provided as GIS data layers to the Board and can be viewed at different scales on the Board’s map viewer, together with other GIS mapping data such as current zoning, transportation, utilities, natural resources, river corridors, available flood hazard areas, etc.
86. The Board evaluated the FLU map component of the Plan to determine if it delineates boundaries that are consistent with the land use categories described in statute pursuant to 24 V.S.A. § 4348a(a)(12)(A)-(J).
87. The Plan and its FLU Map include 1 Downtown Center, as follows, with its general location and naming as identified on Maps 14 and 15 of the Plan (Exhibit 020, pages 111-112), and the more specific boundary as identified on the GIS FLU Mapping:

Downtown Center

St. Albans City

88. The Plan and its FLU Map include 31 Village Centers in 19 Towns, as follows, with general location and naming as identified on Maps 14 and 15 of the Plan (Exhibit

020, pages 111-112), and the more specific boundary of each Village Center as identified on the GIS FLU Mapping:

Village Center

Alburgh Village
Bakersfield
Berkshire Center, East Berkshire, West Berkshire
Enosburg Falls
Fairfax, Fairfax South Village
Fairfield, East Fairfield
Fletcher Center, Binghamville
Franklin
Georgia Center, Georgia South Village
Grand Isle Village, Grand Isle Station
Highgate, Highgate Falls, Highgate Springs
Isle Lamotte
Montgomery Center, Montgomery Village
North Hero
Richford
Sheldon Creek, Sheldon Springs
South Hero, Keeler Bay
St. Albans Bay
Swanton

89. The Plan and its FLU Map include 20 Village Areas in 13 Towns, as follows, with general location and naming as identified on Maps 14 and 15 of the Plan (Exhibit 020, pages 111-112), and the more specific boundary of each Village Area as identified on the GIS FLU Mapping:

Village Areas

Bakersfield
Berkshire Center, East Berkshire
Fairfax South Village
Fairfield, East Fairfield
Binghamville (located in Fletcher)
West Berkshire
Franklin
Georgia Center, Georgia South Village
Grand Isle Village, Grand Isle Station
Highgate, Highgate Falls

Sheldon Creek, Sheldon Springs
South Hero, Keeler Bay
St. Albans Bay

90. The Plan and its FLU Map include 6 Planned Growth Areas (“PGA”s) in 6 Towns, as follows, with general location and naming as identified on Maps 14 and 15 of the Plan (Exhibit 020, pages 111-112), and the more specific boundary of each PGA as identified on the GIS FLU Mapping:

Planned Growth Areas

Enosburgh Falls
Swanton
St. Albans City
St. Albans Town
Fairfax
Richford

91. The FLU Map and location and extent of each FLU area were evaluated by the Board in detail. Exhibit 026, together with the Plan, FLU Map, and supporting information, satisfactorily demonstrate how the specific above-referenced (1) downtown center, (31) village centers, (20) village areas, and (6) planned growth areas, qualify for inclusion as mapped on the FLU mapping that is a component of the Plan.
92. The Board has evaluated if the Plan's (1) downtown center, (31) village centers, (20) village areas, and (6) planned growth areas, have been identified and mapped consistent with the statutory requirements:
93. The Plan's (1) downtown center, (31) village centers, (20) village areas, and (6) planned growth areas, are each and all consistent with and meet the statutory standards and requirements for their respective categories of land use areas, as depicted on the FLU mapping which is a component of the Plan.
94. The Board has evaluated if the Plan's Transition or Infill Areas; Resource-Based Recreation Areas; Enterprise Areas; Hamlets; Rural-General; Rural- Conservation; and Rural – Agricultural and Forestry have been identified and mapped consistent with the statutory requirements for these areas.
95. The Plan's Transition or Infill Areas; Resource-Based Recreation Areas; Enterprise Areas; Hamlets; Rural-General; Rural- Conservation; and Rural – Agricultural and Forestry are consistent with and meet the statutory standards and requirements for their respective categories of land use areas, as depicted on the FLU mapping which is a component of the Plan.

96. The FLU mapping component of the Plan is satisfactorily compatible with mapping of adjacent regional plan areas.

97. NRPC has documented that the “Tier 1B-eligible areas” on its FLU map were mapped in accordance with the 24 V.S.A. §4348(a)(12) (Exhibit 025).

Based on the above findings, the Board concludes that the Plan’s FLU mapping is consistent with the requirements of 24 V.S.A. § 4348a(a)(12)(A)-(J).

D. TIER 1B AREA STATUS REQUESTS

With regard to 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 FLU 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).

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).

98. The Commission and the municipalities identified below, through the NRPC Plan, requested Tier 1B status for the following 13 municipalities, and areas (Exhibit 025):

Bakersfield Town

- Bakersfield Village Center
- Bakersfield Village Area

Berkshire Town

- Berkshire Center Village Center
- Berkshire Center Village Area
- East Berkshire Village Center
- East Berkshire Village Area
- West Berkshire Village Center
- West Berkshire Village Area

Enosburgh Town

- Enosburg Falls Village Center
- Enosburg Falls Planned Growth Area¹

Fairfax Town

- Fairfax Village Center
- Fairfax Planned Growth Area
- South Fairfax Village Center
- South Fairfax - Village Area

Georgia Town

- Georgia Center Village Center
- Georgia Center Village Area
- Georgia South Village Center
- Georgia South Village Area

Highgate Town

- Highgate Center Village Center
- Highgate Center Village Area
- Highgate Falls Village Center
- Highgate Falls Village Area
- Highgate Springs Village Center

¹ this area is not fully identified within Exhibit 025, but is shown on the FLU mapping for Tier 1B status, and is identified in the municipal resolution, and thus interpreted by the Board as a requested Tier 1B area.

Sheldon Town

- Sheldon Creek Village Center
- Sheldon Creek Village Area
- Sheldon Springs Village Center
- Sheldon Springs Village Area

St. Albans City

- St. Albans Downtown Center
- St. Albans Planned Growth Area

St. Albans Town

- St. Albans Bay Village Center
- St. Albans Bay Village Area
- St. Albans Planned Growth Area

Swanton Town

- Swanton Village Center
- Swanton Planned Growth Area

Grand Isle Town

- Grand Isle Village Center
- Grand Isle Village Area
- Grand Isle Station Village Center
- Grand Isle Station Village Area

North Hero Town

- North Hero Village Center

South Hero Town

- South Hero Village Center
- South Hero Village Area
- Keeler Bay Village Center
- Keeler Bay - Village Area

99. Each of the 13 municipalities listed above has requested to have the noted FLU area mapped for Tier 1B status. Total 43 areas within 13 municipalities are proposed for Tier 1B status, via the Plan. Some of the 43 areas are contiguous to other areas, for example a village area adjacent to a village center, whereby the effective total number of contiguous areas is 24 (NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025; Tier 1B resolutions, Exhibit 028; GIS FLU and Tier 1B mapping component of the Plan).

100. Each of the 13 municipalities listed above (requesting one or more Tier 1B area) has a duly adopted and approved plan and a planning process that is confirmed in

accordance with 24 V.S.A. § 4350 (NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025; confirmation letters, Exhibit 027; Tier 1B resolutions, Exhibit 028)

101. Each of the 13 municipalities listed above (requesting one or more Tier 1B area) has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442. (Board list of 1-Acre and 10-Acre municipalities, available at <https://act250.vermont.gov/1-acre-and-10-acre-municipalities>; NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025; Tier 1B resolutions, Exhibit 028)
102. The requested Tier 1B areas conform to the FLU mapping requirements of 24 V.S.A. § 4348a(a)(12)(A)-(C), as found and concluded by the Board on page 57.
103. The requested Tier 1B areas, as mapped on the FLU mapping component of the Plan, exclude 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). (GIS FLU mapping; NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025; Tier 1B resolutions, Exhibit 028).
104. Each of the 13 municipalities (requesting one or more Tier 1B area) has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in each of the areas proposed for Tier 1B status. (GIS FLU mapping; NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025).
105. Each of the 13 municipalities (requesting one or more Tier 1B area) has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area. (NRPC Tier 1B Memorandum dated March 30, 2026, Exhibit 025; Tier 1B resolutions, Exhibit 028).

Based on the above findings, the Board concludes that the requested and mapped Tier 1B areas for all 13 municipalities requesting one or more Tier 1B areas meet the requirements of 10 V.S.A. § 6033(c).

V. CONCLUSION

1. Regional Plan

The Board has concluded that the NRPC's Plan has satisfied the burden of proof and issues an Affirmative Determination pursuant to 24 V.S.A. § 4348(h)(4).

2. Tier 1B Status Areas

The Board has concluded that the NRPC's Tier 1B status requests have satisfied the statutory requirements of 10 V.S.A. § 6033(c), 24 V.S.A. § 4348a(12)(A)-(C), and 24 V.S.A. Chapter 139. Therefore, the Board approves the Tier 1B status requests.

3. Effective Date

The Northwest Regional Plan shall take effect as of the date of this determination. 24 V.S.A. § 4348(m). NRPC must send the Plan to the entities listed in 24 V.S.A. § 4348(d). An affirmative determination of regional plan compliance shall remain in effect until the end of the period for expiration. See 24 V.S.A. § 4348(k).

The Board's approval of the Tier 1B status requests confers Tier 1B status on each of the areas approved as of the date of this decision. Pursuant to 24 V.S.A. § 4348(m) these determinations are not subject to appeal.

Dated this 12th day of June, 2026.

Land Use Review Board

By: /s/ Janet Hurley
Janet Hurley, Chair

Members participating in this Regional Plan Affirmative Determination and Approval of Tier 1B status area requests:

/s/ Sarah Hadd

/s/ Brooke Dingledine

/s/ Kirsten Sultan

/s/ Alex Weinhausen

Recipient List

A copy of the foregoing Determination of Regional Plan Compliance and Tier 1B Requests for **RPC08-0001** has been sent on this June 12, 2026, as follows. To the extent that an email is not listed, the document has been sent by U.S. First Class mail.

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kmccarthy@ccrpcvt.org

Chittenden County Regional Planning
Commission
Attn: Sarah Muskin
SMuskin@ccrpcvt.org

Dated June 12, 2026.

/s/ Catherine Gott
Legal Services Specialist
Land Use Review Board
act250.board@vermont.gov