

CITY OF SAINT ALBANS
Growth Center Designation Decision

Vermont Expanded Downtown Board

July 26, 2010

Introduction

The Expanded Downtown Board considered the City of St. Albans' application for growth center designation at their July 26, 2010 warned public meeting. The Board voted at that meeting to formally approve the City of St. Albans' application and to award growth center designation, based upon their review of the application materials, the Planning Coordination Group's June 10, 2010 unanimous recommendation, and the statutory designation criteria in 24 V.S.A. §2791. Below is a summary of the Board's findings and conclusions, with attached conditions. This decision is based on testimony presented at the hearing and the following documents:

- a. Growth Center Map (Map 1) dated May, 2009 and attached to this decision.
- b. Application for Growth Center Designation received on May 27, 2010.
- c. Supplemental information provided on a CD:
 1. City of St. Albans 2006 Municipal Plan
 2. Land Development Regulations, last amended December 14, 2009
 3. 2009 Downtown Master Plan
- d. Correspondence:
 1. July 1, 2010 letter to the City from the Smart Growth Collaborative
 2. July 2, 2010 memo to the City from Wayne Elliott, PE or the Wastewater Treatment Facility, Uncommitted Reserve Capacity.

Unless otherwise indicated, map, page and figure numbers cited below are from the St. Albans Application for Growth Center Designation.

1. Location of Growth Center

the growth center proposal meets the definition of a growth center established in subdivision 2791(12) of this title. 24 V.S.A. § 2793c(e)(1)(A).

"Growth Center" means an area of land that ... is located in one or a combination of the following:: 24 V.S.A. § 2791(12)(A).

(i) A designated downtown, village center, or new town center;

(ii) An area of land that is in or adjacent to a designated downtown, village center, or new town center, with clearly defined boundaries that have been approved by one or more municipalities in their municipal plans to accommodate a majority of growth anticipated by the municipality or municipalities over a 20-year period. Adjacent areas shall include those lands which are contiguous to the designated downtown, village center, or new town center. In situations where contiguity is precluded by natural or physical constraints to growth center development, adjacent areas may include lands lying close to and not widely separated from the majority of the lands within the designated growth center. Noncontiguous land included as part of a growth center must exhibit strong land use, economic, infrastructure, and transportation

relationships to the designated downtown, village center, or new town center; be planned to function as a single, integrated growth center; and be essential to accommodate a majority of growth anticipated by the municipality or municipalities over a 20-year period. 24 V.S.A. § 2793c(e)(1)(a) and 24 V.S.A. § 2791(12)(A)(i) and (ii).

The Growth Center includes and surrounds St. Albans' Designated Downtown and is found to meet the area definition of a growth center. Map 1 on page 6 shows the relationship between the downtown and the growth center.

2. Natural and Historic Resources within Growth Center

the applicant has identified "important natural resources" and historic resources within the proposed growth center and the anticipated impacts on those resources, and has proposed mitigation. 24 V.S.A. § 2793c(e)(1)(B).

"Important Natural Resources" means headwaters, streams, shorelines, floodways, rare and irreplaceable natural areas, necessary wildlife habitat, wetlands, endangered species, productive forest lands, and primary agricultural soils, all of which are as defined in 10 V.S.A. chapter 151. 24 V.S.A. § 2791(14)

Land in St. Albans City is currently urban but the application identifies and describes the remaining important natural resources within the growth center – primarily the streams and floodways.

Map 16, Natural Resources, identifies the important natural resources within the growth center and they are further discussed on pages 69-72. The map indicates the presence of a Class II wetland associated with the pond south of Lower Welden Street. No issues concerning the wetland were raised by the Agency of Natural Resources (ANR). An uncommon but not rare fish, the Brook Stickleback, has been found in two locations along Stevens Brook within the growth center. All lands with primary agricultural soils, as shown on Map 18, have been substantially urbanized (page 69).

The growth center drains into Stevens Brook and its tributaries as shown on Map 16. A small portion at the southernmost end of the growth center drains into Rugg Brook. Both brooks flow into St. Albans Bay on Lake Champlain. A city stormwater system conveys stormwater to the streams from impervious surfaces. Portions of both watersheds have been designated as stormwater impaired by Vermont Department of Environmental Conservation (DEC) and a Total Maximum Daily Load (TMDL) has been identified for each stream. ANR is in the process of deciding how to implement the TMDL according to an applicant statement before the PCG. The city is committed to working with ANR to develop a plan for addressing stormwater concerns for both existing and future development.

The Vermont Agency of Natural Resources (ANR) expressed concerns at the PCG meeting about the lack of regulatory protection for the undeveloped portions of the floodplain in the city. ANR recommends, at a minimum, that the city report for the 5 year growth center renewal review on whether flood erosion hazard regulations (FEH) or other bylaws have been adopted and report on what development has occurred in the floodplain.

Anticipated impacts from growth center development include additional impervious surfaces that could further exacerbate stormwater impacts on Stevens and Rugg Brooks and creation of further fluvial erosion hazards. The City has proposed to mitigate the existing and anticipated impacts from development as follows:

- Plans are in place to abate a combined sewer overflow at Lower Welden Street and to implement improvements at the wastewater treatment plant.
- Incremental efforts to manage stormwater, including rain gardens, cisterns and permeable pavement are described on pages 69-71.
- The Planning Commission is considering a Fluvial Erosion Hazard Overlay to reduce encroachment of development on the streams and applying LEED standards for reducing stormwater volumes and contamination of the streams.
- Enrollment of contaminated properties in the EPA Brownfield Program to assess and remediate contamination.
- A tree canopy assessment has been conducted and the city will be developing a management plan for trees as part of the Downtown Master Plan as described on Page 72.

The application describes the historic resources within the growth center on pages 72-75 with a map of the downtown St. Albans Historic District on page 74 (Map 17), which is listed on the National Register. Outside the downtown, the application states that more work is needed to identify to identify and plan for historic resources.

No known archeological sites exist in the growth center but the potential for prehistoric sites exists because of the City's location between multiple streams and the glacial lake plain and western slopes of the Green Mountains (page 73). According to the Division for Historic Preservation, Rugg Brook and Jewett Brook, both tributary to Lake Champlain, have headwaters or traverse near the south and west boundaries of the growth center and are also highly sensitive for Native American sites. In addition, the city is located on the edge of the Champlain Sea basin and contains wave washed till deposits and former shore lines. Potentially significant historic archeological features are also likely to be present throughout the growth center including industrial and railroad related prior to the Civil War in the vicinity of the current railroad corridor. Early residential and agricultural related archeological resources are also present within the growth center boundaries.

The applicant has identified historic resources and any anticipated impacts on historic resources from growth center development are proposed to be mitigated through the following steps:

- Conducting a Historic Resource Survey scheduled in 2012 as described on page 73.
- Technical assistance that SAFF provides to downtown property owners helps them obtain historic tax credits for renovations (page 74).
- Design review standards are applied to development in the Historic District.
- Support for public and private improvements to historic properties in keeping with the Downtown Master Plan (page 75).

3. Agricultural Soils and Areas

the approved municipal plan and the regional plan both have been updated during any five-year plan readoption that has taken place since the date the secretary of agriculture, food and markets has developed guidelines in compliance with 6 V.S.A. § 8, have been used to identify areas proposed for agriculture, and have been designed so as to avoid the conversion of primary agricultural soils, wherever possible. 24 V.S.A. § 2793c(e)(1)(C).

The approved municipal and regional plans include maps showing agricultural soils covering nearly all land within the Growth Center, as shown on Map 18. No intact areas of agricultural soils remain for agricultural use. The only significant area of undeveloped land is Aldis Hill, a city park in the northeast corner of the Growth Center and one of the only areas of the city without agricultural soils.

Since primary agricultural soils within the Growth Center were converted to urban development during the past two centuries, the City now aims to further intensify development within its boundaries to prevent unnecessary development on agricultural lands outside the Growth Center.

The city also supports agricultural and forestry practices in rural Franklin County by providing a home for the largest cooperative creamery in Vermont and by hosting the annual Vermont Maple Festival and a weekly farmer's market. The marketing plan for the downtown includes numerous goals that seek to build on the rich agricultural heritage of Franklin County and the opportunities it provides for both enhancing the vitality of the downtown and supporting the local agricultural economy (pages 83-84).

4. Municipal Plan

the applicant has a regionally confirmed planning process and an approved municipal plan, pursuant to section 4350 of this title, and the approved plan contains provisions that are appropriate to implement the designated growth center proposal. 24 V.S.A. § 2793c(e)(1)(D)(i) and (ii).

The Northwest Regional Planning Commission approved St. Albans City's 2006 municipal plan and confirmed its planning process on September 27, 2006. The City is preparing to launch a one year process for updating the plan in the fall of 2010.

The Plan contains provisions that are appropriate to implement the growth center (See Municipal Plan provided on accompanying CD). In particular, the land use section of the plan promotes development in keeping with Smart Growth principles (Section 2.4 of the Plan):

GOAL: To guide and direct the future development of the City according to a land use plan which recognizes historic development patterns and allows for reasonable rates of growth consistent with environmental and cultural values.

Policy: The City should continue to serve as the region's growth center, and as the economic, transportation, and governmental center.

Policy: Concentration of retail activity in the Central Business Sub-district should be

continued. Other types of commercial development should be accommodated within the Business district, or other districts as PUD provisions allow. Mixed use of the Central Business Sub-district should be encouraged where compatible.

Objective: Land use regulations, including zoning and subdivision bylaws, should be changed to address changing needs and conditions identified through the planning process.

Policy: New development/redevelopment should be compatible with existing land-use, and should reflect the human scale/pedestrian orientation of the City.

Objective: Municipal and other public facilities should be centrally located wherever feasible.

Other provisions of the Municipal Plan are discussed throughout the application, including the goals supporting natural and historic resource protection that are included within the application on Pages 78-80.

5. Bylaws

the applicant has adopted bylaws in conformance with the municipal plan that implement the provisions in the plan that pertain to the designated growth center. 24 V.S.A. § 2793c(e)(1)(D)(iii).

The city's Land Development Regulations were last amended on December 14, 2009. (See bylaws, Supplement 2 on the CD accompanying the application.) The regulations include zoning, subdivision and design review bylaws. These regulatory provisions conform to the municipal plan and implement the provisions that pertain to the growth center including the following provisions:

- Residential density maximums of more than 4 units per acre are allowed, even in the Low Density Residential (LDR) district.
- The primary commercial, financial, retail and governmental uses are concentrated in the Central Business Sub-district (B1) that roughly corresponds to the designated downtown.
- Diverse uses are permitted within the Growth Center including a full range of residential types, commercial, civic and industrial uses.
- The design review districts require that new development support a pedestrian-friendly environment in keeping with the historic character of the city.

The City Planning Director indicated to the PCG that the city plans to update the bylaws in 2012 to incorporate form based zoning that aims to provide greater predictability for developers and development that furthers smart growth principles. An update on the bylaws was recommended by the PCG when the City returns to the board for the 5-year designation renewal.

6. Natural and Historic Resources Outside the Growth Center

the approved plan and the implementing bylaws further the goal of retaining a more rural character in the areas surrounding the growth center, to the extent that a more rural character exists, and provide reasonable protection for "important natural resources" and historic resources located outside the proposed growth center. 24 V.S.A. § 2793c(e)(1)(D)(iv).

St. Albans City contains no rural land within its boundaries. Rural lands outside the boundaries of the Growth Center are under the jurisdiction of St. Albans Town and municipalities adjoining it. A high proportion of the agricultural land surrounding St. Albans City is conserved as shown on Map 9. The City intends to maintain the rural character of the lands it owns in rural locations outside the Growth Center (such as water supply areas) as shown on Map 10 and to support regional planning efforts in the area as described on page 42.

The St. Albans Municipal Plan includes numerous recommendations for facilitating development within the city which is expected to relieve pressure for development outside the Growth Center. (See findings under Section 3 above.) The provision of incentives through Growth Center Designation is also expected to draw development towards higher density sites within the city and away from greenfields in surrounding towns.

7. Infrastructure and Capital Planning

the applicant has adopted a capital budget and program in accordance with section 4426 [4430] of this title, and that existing and planned infrastructure is adequate to implement the growth center. 24 V.S.A. § 2793c(e)(1)(E).

St. Albans City's Capital Improvement Program (CIP) was adopted on February 8, 2010. Improvements needed to support the Growth Center are discussed on pages 48-54 of the application.

The water supply system has a capacity to produce six million gallons per day (GPD) with a little over one third of that capacity currently in use. Planned improvements to the system are addressed in the CIP to address deferred maintenance. Sufficient capacity exists to support the 20 year growth projections.

The wastewater treatment facility has a hydraulic design capacity of 8 million GPD but is currently permitted by ANR to process 4 million GPD. 3,657 GPD reserved for downtown development and more will be available if needed. A total of 253,500 GPD are committed, including 100,000 GPD available by agreement to the City of St. Albans Town to serve the area around the city shown on Map 5 (page 26). An average of 2,350,000 GPD of wastewater is processed today from both the city and town. Up to 1,396,500 GPD in hydraulic capacity is available to meet the 20 year growth projections. (See July 2, 2010 memo by Wayne Elliott, PE for further detail on capacity.)

The need for additional organic capacity is being addressed through facility upgrades to improve nutrient removal for the discharge into St. Albans Bay. The wastewater treatment plant is currently at 100% organic capacity for biochemical oxygen demand. The current upgrades will increase organic capacity from the 8,000 lbs/day to 11,000 lbs/day to better align with the available hydraulic capacity. (7/2/10 Memo by Wayne Elliot, PE.) Additional upgrades may be necessary to meet water quality targets and are anticipated in the CIP.

Stormwater treatment and infrastructure needs are discussed above in Section 2. The ANR representative noted at the PCG meeting that stormwater treatment may be required not only for new construction but also for existing development in the future and suggested that the city report on how stormwater needs are being addressed in the CIP at the five year Growth Center Designation review.

Transportation needs and improvements are discussed on pages 59-68. The CIP focuses transportation priorities on the Federal Street construction project. The VTrans representative to the PCG pointed out that the CIP focused on vehicular transportation improvements and suggested (and others concurred) that in future updates of the CIP, there be a funding category for non-vehicular travel infrastructure and that this be reviewed when the growth center designation is renewed.

Existing and planned infrastructure is found to be adequate to implement the City of St. Albans' Growth Center.

8. Size of Growth Center

the growth center is of an appropriate size sufficient to accommodate a majority of the projected population and development over a 20-year planning period in a manner that is consistent with the definition under subdivision 2791(12) of this title, and that the growth center does not encompass an excessive area of land that would involve the unnecessary extension of infrastructure to service low-density development or result in a scattered or low-density pattern of development at the conclusion of the 20-year planning period. 24 V.S.A. § 2793c(e)(1)(F).

The proposed growth center is 1,201 acres, within the 1,256 acre city. Well over 50% of the 1,800 new jobs and 517 new residents with 220 housing units projected over a 20-year period can fit into the growth center in a manner consistent with the statutory definition of Growth Center, as described in the growth projections and build out analysis on pages 5–26.

Population in St. Albans city has decreased since 1960 when 8,800 people or 30% of Franklin County residents lived in the city. By 2000, population dropped to 7,650 (17% of the county). Statistical approaches show steady growth in employment in the city but a slow drop in residents over the next 20 years (Figures 5 and 9). The city seeks Growth Center Designation to actively support development in the city in order to reverse the downward population trend. Housing growth projections for the next 20 years, presented in Figure 7 and Table 4, are based on the goal of retaining the current 17% share of the County's population. These goal-based projections are supported by the projected growth in jobs, the land available for development and redevelopment within the growth center, as well as changes in demographics and housing preferences favoring urban residences.

Sewer, water line and transportation improvements (but no extensions) are planned as discussed above in Section 7 to support existing and planned development in the city. The measures discussed in sections 3-5 above ensure that neither scattered nor low-density development will result from the planned investments in infrastructure.

Given the configuration of the growth center, the fact that no previously undeveloped land is involved, and the city's projected growth over the next 20 years, the growth center does not encompass an excessive area of land that would involve unnecessary extension of infrastructure to serve low-density development or result in scattered or low-density development at the end of the 20 year period.

9. Support for Downtown, Village Center or New Town Center

the growth center will support and reinforce any existing designated downtown, village center, or new town center located in the municipality or adjacent municipality by accommodating concentrated residential neighborhoods and a mix and scale of commercial, civic, and industrial uses consistent with the anticipated demand for those uses within the municipality and region. 24 V.S.A. § 2793c(e)(1)(G)(i).

Other than downtown St. Albans within the growth center, there are no designated downtowns, villages or new town centers located in or adjacent to the city. St. Albans city has the only designated downtown in the Northwest region. The closest designated village center to the city is the village of Swanton that serves mainly as a local service center (pages 27-29).

The city's downtown serves as the "commercial hub for goods and services" in the northwest region (page 29). St. Albans city has 250 retail establishments in the downtown area, accounting for 12% of the retail share in the region. Competition for retail sales is strong; both from the shopping centers at I-89 Exit 20 in St. Alban Town immediately north of the city, and from the retail businesses in Chittenden County, a 30 minute drive away. The city's stated goal is to continue to attract employment and a variety of housing types within the growth center to support businesses and services in downtown St. Albans.

The city now provides for a mix of residential, commercial, civic and industrial uses within the growth center with the highest concentrations within the designated downtown. The mix and scale of those uses proposed within the growth center are consistent with the municipal and regional demand and will support and reinforce the designated downtown within St. Albans City.

10. Capacity for Growth in Downtown, Village Center or New Town Center

the proposed growth center growth cannot reasonably be achieved within an existing designated downtown, village center, or new town center located within the applicant municipality. 24 V.S.A. § 2793c(e)(1)(G)(ii).

Through its projections, the city anticipates that about 220 additional housing units and 1,800 additional jobs will be added to the city over the next 20 years. The build out analysis did not evaluate the potential for a majority of that growth to occur in the designated downtown.

Instead, the city identified and showed the development potential of 10 sites within the growth center, of which 7 sites are in or immediately adjacent to the designated downtown and the remaining sites close by. The Summary of Build-Out Analysis of Ten Redevelopment Sites (Appendix 1) demonstrates that substantial redevelopment potential exists on those sites – both those in the downtown and those outside (but within the growth center).

The city takes the position that not all types of development are appropriate in the designated downtown. Residential neighborhoods surrounding a downtown should reflect a gradient of decreasing density from the most dense within the downtown to compact but less dense types such as detached housing units at the outer edges of the growth center. Most industrial uses would also be inappropriate within the designated downtown and thus additional re-development land is needed within the growth center to accommodate the full range of development types desired by the city. The proposed growth therefore cannot reasonably be achieved within the existing designated downtown, especially to meet the city's future needs for diverse housing options.

11. Definition of Growth Center

A **growth center** contains substantially the following **characteristics**: 24 V.S.A. § 2791(12)(B).

- (i) It incorporates **a mix of uses** that typically include or have the potential to include the following: retail, office, services, and other commercial, civic, recreational, industrial, and residential uses, including affordable housing and new residential neighborhoods, within a densely developed, compact area;
- (ii) It incorporates existing or planned **public spaces** that promote social interaction, such as public parks, civic buildings (e.g., post office, municipal offices), community gardens, and other formal and informal places to gather;
- (iii) It is organized around one or more **central places or focal points**, such as prominent buildings of civic, cultural, or spiritual significance or a village green, common, or square.
- (iv) It promotes **densities of land development** that are significantly greater than existing and allowable densities in parts of the municipality that are outside a designated downtown, village center, growth center, or new town center, or, in the case of municipalities characterized predominately by areas of existing dense urban settlement, it encourages in-fill development and redevelopment of historically developed land.
- (v) It is supported by existing or planned **investments in infrastructure** and encompasses a circulation system that is conducive to **pedestrian and other non-vehicular traffic** and that incorporates, accommodates, and supports the use of **public transit systems**.
- (vi) It results in **compact concentrated areas of land development** that are served by existing or planned infrastructure and are separated by rural countryside or working landscape.
- (vii) It is planned in accordance with the **planning and development goals under section 4302** of this title, and to conform to **smart growth principles**. [See #12 below.]
- (viii) It is planned to reinforce the purposes of 10 V.S.A. chapter 151 [Act 250].

St. Albans' proposed growth center contains the following characteristics that substantially meet the definition of a growth center.

Mix of uses – The existing and planned mix of uses includes retail, office, services, and other commercial, civic, recreational, industrial, and residential uses, including affordable housing and new residential neighborhoods (pages 43-45).

Public spaces – Parks, schools and other public spaces are well distributed throughout the city as shown on Map 11 and discussed on pages 55-56.

Central places or focal points – The downtown is organized around Taylor Park, a large green which marks the geographic, social, and commercial center of the city. This and other focal points around key educational and employment centers in the city are discussed on page 57.

Densities – St. Albans City is characterized predominately by areas of existing dense urban settlement and the city encourages in-fill development and redevelopment of historically developed land as discussed above in Sections 5 and 7.

Infrastructure investments – Investments in infrastructure are discussed above in Section 7. The City Manager informed the PCG that new development is required to contribute to sidewalks, bus shelters, etc. and the city charter includes the ability to assess adjoining landowners 1/3 the cost of sidewalks. The city already has 19 miles of sidewalks. ANR noted the city's progress towards obtaining "Tree City USA" designation and the importance of green infrastructure in water quality improvements and recommended making improvements in this area a priority.

Compact development – St. Albans city is already a compact concentrated area of development and plans to continue relying on existing infrastructure to improve and further infill within the existing boundaries. The less-compact, developed areas at the northern and southern ends of the city were removed from the Growth Center boundaries.

Statewide planning goals and smart growth principles – See findings below.

Act 250 purposes – The St. Albans Growth Center meets the purposes of Act 250 by planning to concentrate development in a location where infrastructure is available and the majority of development will be infill.

12. Definition of Smart Growth

"Smart growth principles" means growth that: 24 V.S.A. § 2791(13)

- (A) Maintains the **historic development pattern** of compact village and urban centers separated by rural countryside.
- (B) Develops **compact mixed-use centers** at a scale appropriate for the community and the region.
- (C) Enables **choice in modes of transportation**.
- (D) Protects the state's **important environmental, natural and historic features**, including natural areas, water quality, scenic resources, and historic sites and districts.
- (E) Serves to **strengthen agricultural and forest industries** and minimizes conflicts of development with these industries.
- (F) Balances growth with the availability of **economic and efficient public utilities and services**.
- (G) Supports a **diversity of viable businesses in downtowns and villages**.
- (H) Provides for **housing** that meets the needs of a diversity of social and income groups in each community.
- (I) Reflects a **settlement pattern** that, at full build-out, **is not characterized by:**
 - (i) **scattered development** located outside of compact urban and village centers that is excessively land

- consumptive;*
- (ii) *development that **limits transportation options**, especially for pedestrians;*
 - (iii) *the **fragmentation of farm and forest land**;*
 - (iv) *development that is **not serviced by municipal infrastructure** or that **requires the extension of municipal infrastructure across undeveloped lands** in a manner that would extend service to lands located outside compact village and urban centers;*
 - (v) ***linear development along well-traveled roads** and highways that lacks depth, as measured from the highway.*
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St. Albans City's proposed growth center is planned to substantially conform to the smart growth principles as follows.

Historic development pattern – St. Albans City is a compact, historic urban center and the growth center is planned to reinforce the existing pattern.

Compact, mixed use centers – St. Albans City is a compact, mixed use center and the growth center is planned to maintain the compactness and enable the city to continue serving as the employment and service center for the northwest region while supporting a wide range of housing options.

Transportation choice – Most of the land within the growth center is within a ½ mile walk of the downtown and other key destinations in the community (Map 12) and sidewalks are available throughout. Hourly bus service is available to points around the St. Albans City and Town, stopping at the hospital, grocery stores and housing complexes among others, and daily express commuter bus service to Burlington is available as well (page 62).

Important environmental and historic features – See findings under Section 2 above.

Agriculture and forest industries – See findings under Section 3 above.

Public utilities and services – As discussed in Section 7 above, economic and efficient public utilities and services exist and are available to support the city's planned growth.

Diversity of downtown and village businesses – The city's downtown includes a wide range of businesses. The growth center will support the viability and vibrancy of these businesses by encouraging and promoting new employment and housing within walking distance of the downtown.

Diversity of housing – The city's land use regulations enable a diversity of housing types. It has and will continue to partner with public and private entities to ensure that the full range of housing options including subsidized, workforce and market-rate, are available (page 45).

Settlement pattern that is not scattered development, limits transportation options, fragments farm and forest land, requires extension of infrastructure across undeveloped land, or linear development – The city's growth center excludes the two areas of the city that might be characterized as strip development along Route 7 and aims to concentrate development in the core where infrastructure already exists.

Expanded Downtown Board Approval

The Board concludes that the City of St. Albans has demonstrated that its growth center will meet the statutory criteria for growth center designation as discussed herein. The City has worked to implement the proposed growth center as envisioned in their application and has demonstrated through the municipal plan and implementation tools that it will concentrate compact development within the growth center and guide over 50% of the town's growth into this area over the next 20 years. The tools are in place to protect important natural and historic resource lands and the city is conducting the kind of planning expected in the growth center statute.

The Board hereby approves St. Albans application on a unanimous vote, based on these findings and conclusions.

Kevin Dorn, Chair
Expanded Downtown Board

Date

