

Representative Sheldon:

I appreciate the work the committee is undertaking to bring the Act 250 bill to conclusion. Rather than offer comments on all the areas we can support (there are many) I will keep my comments concise and offer comment on three sections. In the first two, we are advocating for deleting the proposed provisions. In the third instance, we are suggesting a slight modification/addition. Page numbers reference version 10.4. Thank you for considering these comments, and thank you to you and the Committee for taking on this challenge! Best regards,

Catherine

*Expanded jurisdiction to interchange areas: Page 6, lines 5-11.*

NRPC does not support the expanded jurisdiction or the additional duties given to regional planning commissions. If achieving smart growth in areas around interchanges is a goal of the committee, it would more effective and straightforward to amend Title 24, Chapter 117 to require municipal bylaws to meet this standard. If this provision is retained, NRPC supports the CCRPC request that language be added to section (xi) to make explicit that the Regional Planning Commission determination that municipal bylaws meet the criteria for exemption provides for an exemption for that interchange area unless the RPC determines at a future date that the bylaws no longer meet the criteria. NRPC also suggests adding language regarding notice requirements and a decision-making process.

*Jurisdictional determinations shifted from district coordinators to District Commissions: Page 14, lines 1-6.*

This change adds complications to a process that currently works in a streamlined and effective manner; the current process should be left in place.

*Municipal discharge of Act 250 permits: Pages 34-35 and 75-76*

A process to discharge permits and permit conditions is necessary, however, municipal panels should not be charged with reviewing and discharging permits issued at the state level. Ideally, this action should be undertaken by the District Commission (or at least the District Coordinator) after review of the municipal permit. If this process is left as is, please consider adding: upon request of a municipality or applicant, the District Coordinator is required to prepare a review of the permit to be entered into evidence addressing items (A)-(E) on pages 75-76.



**Catherine Dimitruk** | *Executive Director*

Northwest Regional Planning Commission | 75 Fairfield Street, St. Albans, VT 05478

Phone: 802.524.5958 | Fax: 802.527.2948 | Website: [www.nrpcvt.com](http://www.nrpcvt.com)