



July 1, 2010

Dominic Cloud, City Manager
City of St. Albans
100 North Main Street
St. Albans, VT 05478

Dear Dom,

We are writing to provide comments regarding the City of St. Albans' application for Growth Center designation, as presented to the Planning and Coordination Group (PCG) on Thursday June 10th. The undersigned members of the Vermont Smart Growth Collaborative support their application for growth center designation. We do have some minor comments and requests for clarification. In making these comments, we want to commend the City for pursuing growth center designation and attempting to manage development in a way that supports the downtown, facilitates smart growth and ensures the City's long-term economic vitality and quality of life. Our comments on the current application are as follows:

- **Appropriately sized growth center.** §2793c (d)(7)(B) asks applicants to develop boundaries that do not encompass *"an excessive area of land that would... result in a scattered or low-density pattern of development at the conclusion of the 20 year planning period."* The City of St. Albans' growth center encompasses 1,213 acres, almost the entire city except for portions of the northern and southern boundaries of the City that were appropriately excluded to achieve compliance with this requirement. Growth projections for 2030 estimate between 1,694-4,054 new jobs and 300 to 949 new housing units. Based on current economic trends, the City felt that more conservative goals of 1,800 new jobs (approximately 540,000 sq. ft. of industrial, office and commercial space) and 220 housing units would be more realistic. The build out analysis within the growth center boundaries indicates room for over 1.1 million square feet and 952 new housing units. Thus, the growth center can accommodate twice the projected office/commercial/retail growth and four times the projected housing needs. In another community, this might lead to concern about an excessive area identified. However, many of the development sites are small and scattered throughout the City, without any single contiguous area of land being available for residential development. Therefore, we accept the City's premise that the proposed boundary is needed to encourage redevelopment and infill, especially to meet future housing needs, which has the potential to increase overall density and increase mobility options for residents.
- **Future growth in the designated downtown.** The GC program (§2793c (d)(8)) requires that the municipality demonstrate *"...that 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 that is consistent with the anticipated demand for those uses within the municipality and region; ...and that 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.” The City of St. Albans has been working with Smart Growth Vermont as a test town for their “Indicators of Downtown Health” project and they have supplied data on various indicators. They have done an extensive review of re-development potential of current buildings in their downtown that should be included more clearly into the application as they answer this portion of the application.

- **Densities of land development.** A growth center needs to meet the definition of a growth center, that includes promoting, “...densities of land development that are significantly greater than existing and allowable densities in parts of the municipalities that are outside a designated downtown...” While the application notes that the maximum density allowed, even in the low density residential, is 4 units per acre, it does not state what the current and/or historic densities are in various districts within the growth center. This would provide a benchmark when comparing current density requirement.
- **Adopted Bylaws.** The growth center program requires, “that the applicant has adopted bylaws in conformance with the municipal plan that implements the provisions in the plan that pertain to the designated growth center.” As noted by ANR’s PCG representative, the City lacks regulatory protection for the undeveloped portions of the floodplain. While they recommend, at minimum, the City adopt bylaws, we would like to see regulations protecting this key natural resources within a year of designation.

Again, we want to commend the City for the extensive review of the development, re-development and infill potential in and around their designated downtown and understanding the effort needed to ensure the downtown rebounds, the community remains an employment center and new residents move to the City. While we have raised some clarifying questions, the undersigned members of the Collaborative support the City of St. Albans’ Growth Center application.

Thank you for providing the opportunity for our organizations to provide feedback on the City’s application. If you have any questions or require clarification, please feel free to contact us.

Best Regards,



Paul Bruhn
Preservation Trust of Vermont



Brian Shupe, AICP
Vermont Natural Resources Council



Noelle Mackay
Smart Growth Vermont

Cc: Faith Ingulsrud, Coordinator, Planning & Growth Center Designation