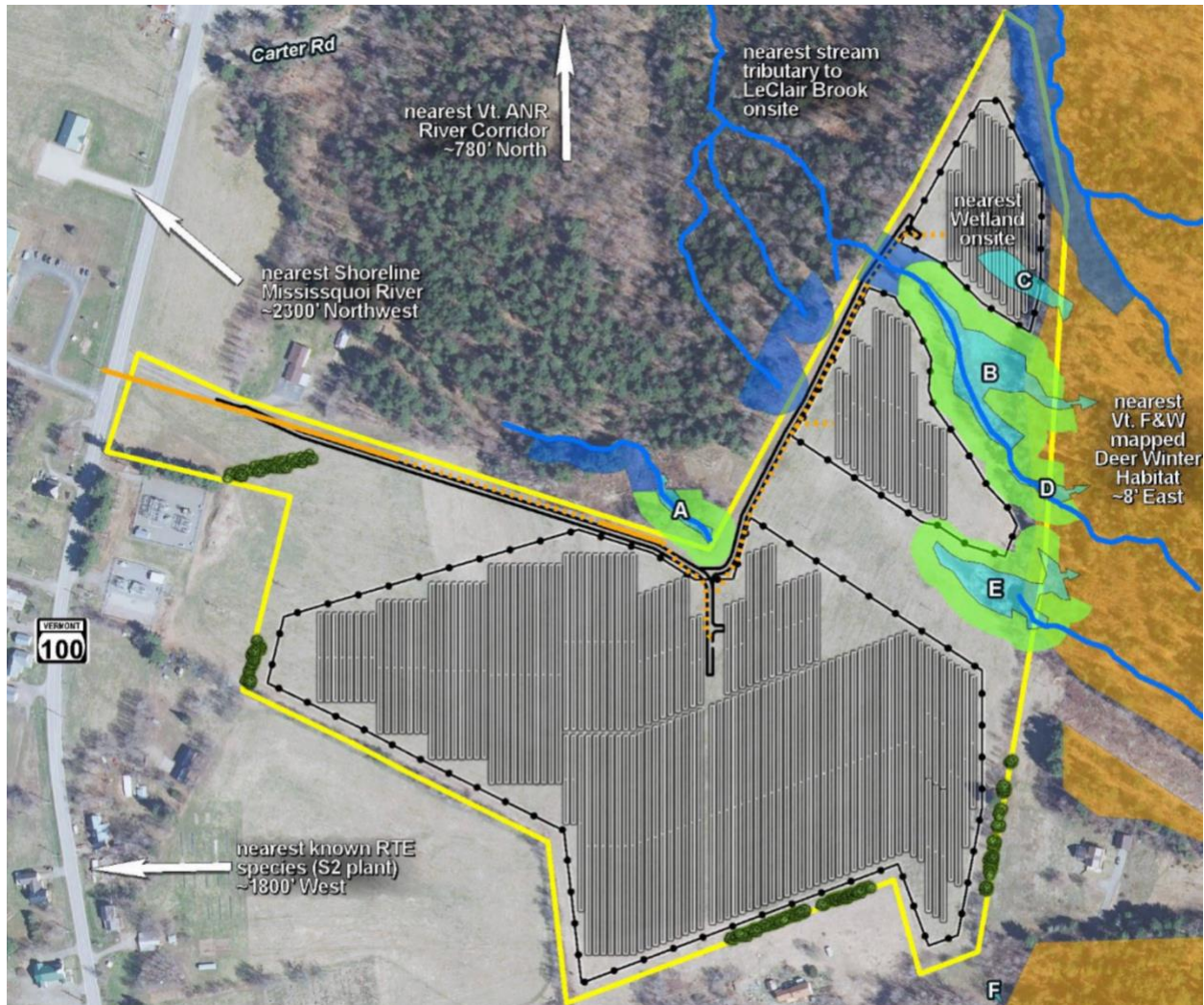


# ASSESSMENT AND REVIEW OF ORDERLY DEVELOPMENT OF THE REGION FOR THE PROPOSED NORTHLAND SOLAR PROJECT

Case No. 25-2346



Gordon Spencer, Lowell Zoning Administrator  
March 13, 2026

## **ORDERLY DEVELOPMENT OF THE REGION**

Orderly development refers to the systematic planning and development of land uses and associated infrastructure in a region or municipality. It is based on a legal process that sets forth land use parameters and regulations to guide future development in a pattern envisioned and adopted by the jurisdictional authority. In reviewing projects for their consistency with the orderly development of the region, the onus is on the Applicant to provide the basis for concluding that the project, as proposed, is consistent with the accepted and established provisions and patterns of development in the town and the region. In addition, any evaluation of Orderly Development must assess the land use and landscape dynamics “on the ground”. The project may or may not fit well with surrounding uses and/or conditions. The nature of the landscape may have distinct limitations or environmental or aesthetic “costs” related to development.

Before the Public Utility Commission issues a Certificate of Public Good for an electric power project such as Northland Solar the PUC must make positive findings that the project will not “unduly interfere with the orderly development of the region”:

. . . with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures contained in the plan of any affected municipality. (30 V.S.A. § 248(b)(1))

The evaluation of a project can yield a conclusion that a project is either consistent or conflicts with Orderly Development. As the language in the statute states, the analysis must include a review of both the municipal and regional plan parameters for development in this district as well as an understanding of the intent of those plans and the positions of the respective authorities. Our review is based on the Lowell Town Plan, the Regional Plan for the Northeast Kingdom, Act 181 Future Land Use and Housing Targets, and the Comprehensive Energy Plan.

### **2023 LOWELL TOWN PLAN**

What follows are the relevant sections of the Lowell Town Plan that identify those policies and goals necessary for Orderly Development of the Region:

*Lowell has unrivaled scenic views in the heart of the Green Mountains. TL-GS-3 p. 6*

*A large percentage of Lowell’s land is forested mixed with rural residential and a small portion being considered “the Village” which is located where Route 58 and Route 100 intersect. This location is commonly referred to as “The Four Corners”. TL-GS-3 p. 6*

The Northland solar project affects the town’s scenic views, and the village as well as residents and visitors traveling through the village.

*Changes are coming at an increasing rate. The problems posed by these pressures must be addressed by comprehensive forethought to ensure that future decisions will provide long-term solutions rather than stopgap measures. Since communities exist primarily for the health and enjoyment of those who live in them, it follows that the nature, location and timing of community growth should be determined by the people of Lowell rather than left solely to chance or to the decisions of non-resident developers. The intent of this plan is not to eliminate any existing land uses or to stop all future development, but rather to channel the desired growth to appropriate locations within the town. TL-GS-3 p. 7*

*It is the primary and fundamental intention of Lowell to remain a rural, agricultural town that encourages farming and a town that encourages individual businesses and entrepreneurship of a scale that can integrate harmoniously into its residential areas. TL-GS-3 p. 8*

The Northland solar project infringes on the major town goal of maintaining a rural, agricultural town – with farmland in dwindling supply and the solar site actively farmed for more than 100 years. The location of a solar project proposed by non-resident developers in the village center minimizes the ability of the Town to enable future development that can integrate harmoniously into residential areas.

*The growth of Lowell should occur in such a way as to enable residents to continue to live in town without undue tax burdens. TL-GS-3 p. 8*

*Allow for commercial and industrial development that fit within the Town's primary objective. TL-GS-3 p. 8*

*Encourage open farmland for agricultural purposes and find new ways to support career farmers and hobby farmers to ensure they can continue their appreciated endeavor. TL-GS-3 p. 9*

*Mountain View Cemetery: VT Route 58 E, Lowell, VT 05847. The cemetery is managed by the Lowell Cemetery Association, incorporated in 1915. The cemetery entrance is just east of Vermont Route 100 at the "Four Corners" crossing. The cemetery has been in continuous use since shortly after the town was incorporated in 1812. The earliest identified burial is 1817. The approximate number of interred is 1100 and 20% of the designated land area is available for future use. TL-GS-3 p. 10*

*In order to prepare for the older generation, the town should pass no regulations that would hamper the building of proper accommodations for the elderly that are attached or adjacent to relatives or other unpaid caregivers. We feel with the proximity to medical help it would not be the ideal location for a nursing home but we will encourage the idea of assisted apartment & retirement living if a developer should consider Lowell. The Town is a beautiful rural and rustic spot for a quiet building designed for the elderly to enjoy. In order to attract the*

*younger families, the Town will continue to ensure it can provide affordable housing options and a strong competitive school system; however, the younger population is determined by employment opportunities which are limited and require long commutes. TL-GS-3 p. 13*

The Lowell Town Plan articulates a vision for appropriate future development in the “Four Corners” area that is in harmony with the highly scenic visual character of the area, welcoming development and agricultural uses that fit with the Town’s objectives.

*Back in 2013, population projections released by the Agency of Commerce and Community Development had indicated that by 2020, Lowell’s population would increase by more than 15% over 2010, and, by 2030, more than 26%. According to the 2020 Census, Lowell’s population increase was much more moderate over the past decade at only 0.9%. While the pandemic has prompted many people to move to Vermont recently, neither dataset provides any insight into how this trend will affect Lowell in the long term. TL-GS-3 p. 16*

#### *Residences*

*Along with agriculture and forestry, residential land use is predominant in Lowell. Most residences are single family dwellings. A good number of the houses are located in the Village area, near the intersection of Routes 58 and 100, providing a cluster of homes for which municipal services could be easily and efficiently provided. However, just as many, if not more are scattered throughout the Town along Routes 58, 100, and the side roads. This type of development does not provide for the efficient use of land or the efficient provision of municipal services. At this time no municipal utilities are provided, and the town does not have plans to institute these services. TL-GS-3 p. 17*

#### *Village Character*

*The Planning Commission is proud of the Town’s historic village and wants to encourage the revival of some original aesthetics it once possessed. The Planning Commission aims to maintain the integrity of all public areas of the town to these standards to encourage residents to follow, bringing the town’s core to its original charm.*

Lowell identifies the Village area as the most efficient and easy location for future residential and business growth. The visual character, scale, and materials of an industrial solar array conflict with this view of the future growth of the area and take land that has the potential to support housing out of consideration for residential development.

#### *Plans for the Village:*

- *Give the town a more community-like and attractive appearance to reflect what the area really is, has been, and could be in the future. This can be done by adding parks, benches, secure places young children can*

*play with their parents, improved sidewalks, elderly housing and easy off-street parking that would encourage business.*

The scale and materials of the Northland solar project contradicts the domestic human scale and visual attractiveness of the long extant in the village. Northland solar would create a less attractive, not more attractive village.



*TL-GS-3 p. 20*

*Most of the land used for agricultural purposes is located adjacent to Route 58 and Route 100 with few scattered among the side roads. TL-GS-3 p. 21*

It is not only the views from the roads that result in impacts but the on-foot exploration of village and forests fields. The existing open field farm land serves as a virtual nature contact park augmenting agricultural use.

*Storms related to Hurricane Irene swept through in late August 2011, causing the Town of Lowell just under \$15,000 in damage to the roads due to flooding. However, there was a larger storm earlier that year causing almost double that. April 23 to May 9, 2011, rainstorms hit Lowell causing almost \$27,000 of flood damage to some of the residential roads. The main thoroughfares of Route 58 and Route 100 were not affected but some Town roads such as Irish Hill, Green Hill and Cheney Road suffered considerable damage with washouts. TL-GS-3 p. 28*

*The Planning Commission is committed to the new regulations set out by the state and will do everything they can to comply including restricting and limiting building new structures in any flood zone. TL-GS-3 p. 29*

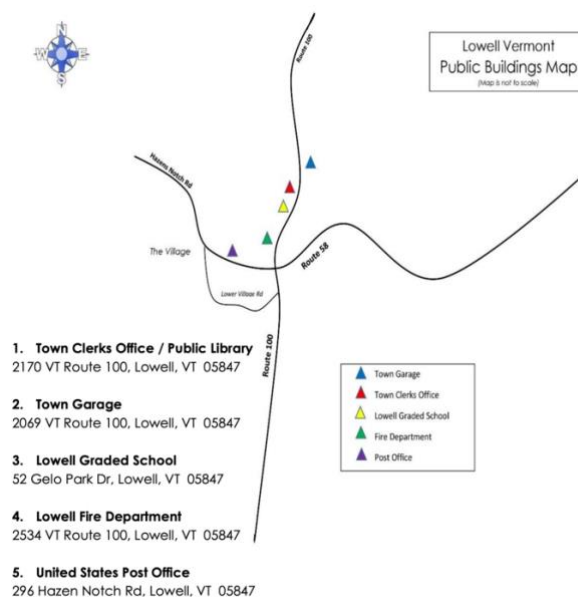
*Allowing retail business and light industry in the Village and Rural Residential districts should not be a cause of disruption or disharmony if the equal rights of all the residents of Lowell can be kept in mind and respected. TL-GS-3 p. 40*

Unlike other areas of Lowell, the Village survived major storms without damage. An industrial scale solar installation in village would result in disruption and disharmony.

*The Zoning Board will welcome businesses to set up in the town in the future and will encourage the development should there be inquiries. Light, non-polluting businesses can add to the Town's employment and tax base. However, such development needs to be carried out without placing an undue burden on the Town's services or natural resources. Businesses that serve the community with goods and services should be given priority. Having local businesses supports the economy and prevents residents from having to travel into nearby towns and cities for necessities. TL-GS-3 p. 40*

*Of the employment in Lowell there are several self-employment businesses which includes but is not limited to- repair shops, campground, dairy farms, a local general store, trucking businesses, sand and gravel, excavating businesses, masonry, landscapers, seasonal restaurant, electronic scoreboards sales, maple and honey producers as well. The majority of this economic activity is surrounding the VT route 100 corridor. TL-GS-3 p. 42*

The Lowell Town Plan does not envision industrial uses that do not benefit the town, especially in the area around the VT Route 100 corridor. Economic activity that does not serve the community or benefit the town is not a priority.



p. 46

*Located at the Lowell Graded School is the school playground, Gelo Park and the Lowell Community Trails. These areas include ball fields, a basketball court, traditional playground equipment, trails behind the ball fields with picnic tables for walking and biking, providing opportunities for both children and adults alike. TL-GS-3 p. 48*

### *Storm Drainage*

*The Town of Lowell has very little in the way of storm drainage, all of which can be found in the village area along Route 58 west of Route 100. Currently these drains function properly with no known problems. TL-GS-3 p. 49*

The Village area in the Town of Lowell supports numerous community educational and recreational activities, and contains adequate storm drainage. The Village is the appropriate location for residential housing growth.

*our region produces more power than it uses, so power is exported out of the region. TL-GS-3 p. 52*

The town and region have already contributed its share of energy. More is produced than can be used.

*Residents of the Town of Lowell, as well as non-residents, who own land in Lowell, are most dependent on Routes 58 and 100, as these two routes are Lowell's main connection with the rest of the world. TL-GS-3 p. 59*

*Scenic Roads Some of the scenic features of Lowell to celebrate are:*

- *Route 58 corridor*
- *Hazen's Notch Road*
- *Bayley Hazen Road*
- *Route 100*
- *Long trail- Belvidere Mountain*

*Route 58 is perhaps the most scenic road in Lowell. This highway passes over some of the higher elevations in Lowell and offers some spectacular views. That section of Route 58 between Irasburg and Route 100 crosses an elevation of almost 1,700 feet above sea level. TL-GS-3 p. 59*

The Northland solar installation would impact state and local scenic roads

Northeast Kingdom Regional Plan Volume 1, incorporated in Lowell Town Plan:

*In both regional and local planning processes, we need to retain and strengthen existing businesses while creating new economic and employment opportunities for residents from all walks of life. We must provide quality educational opportunities and skills training for all job seekers to make the region's workforce more attractive to employers. With an economy that is to a great extent linked to our natural resource base, the region and its municipalities should also embrace strategies to protect the environmental quality in the Northeast Kingdom. The availability of quality, affordable housing is a regional goal also shared by every local community, and upgrading existing, substandard housing is a particularly urgent priority. Northeast Kingdom residents are also encouraged to work with their local, regional, and state agencies and officials to revitalize*

*downtowns, village centers, and cultural institutions to preserve our cherished way of life. TL-GS-3 p. 73*

Revitalization of Lowell's Village is a local, regional and state priority.

*AGRICULTURAL LAND USE GOALS*

*Farming and agriculture will remain an important and viable sector of the regional economy. Contiguous tracts of prime agricultural soils will be preserved. TL-GS-3 p. 74*

Contiguous tracts of prime farm land have added value. They are the central element or component of the historic and preferred identity and character.

*FUTURE LAND USE & DEVELOPMENT GOALS Traditional development patterns should be maintained and new development should be encouraged to follow these patterns. New development will be compatible with existing land uses, and consistent with local plans. TL-GS-3 p. 74*

The logical development pattern is road side or road juncture Village, infill.

Fields are far from underused voids and open spaces. They are the essential ingredient that allows accent and visual and psychological relief from predominating forest land surrounding this Village.

## **2018 REGIONAL PLAN IN THE NORTHEAST KINGDOM**

The Regional Plan in the Northeast Kingdom provides an overall sense of how the region's planners envision development in the region. These narratives, and their associated goals, while broad in perspective, inform our understanding of the regional vision for land use and development, and this project can be "tested", to a certain extent, with regard to the extent to which the proposed development forwards or fights the goals and the vision. The Regional Plan acknowledges the relationship between open spaces, resource protection and the viability of economic development and tourism. The Plan considers scenic and natural resources to be economic assets. It recognizes that there is a balance between identifying appropriate areas for commercial and industrial development and preserving or protecting areas from development that would impact or erode that balance.

### *V. ENERGY RESOURCE ANALYSIS AND RECOMMENDATIONS*

*Where – and how -- would energy generation occur? In support of the 90x2050 goals, each region has a set of generation targets. Because our region already generates a disproportionate share of energy relative to our low population, the Northeast Kingdom's new generation targets are the lowest in the state. (Table 2.19) While generation targets can be met through a variety of renewable technologies, the Northeast Kingdom does not*

*have any generation targets specific to wind. Nevertheless, great care and consideration shall be given to the siting of new generation. TL-GS-4 p. 57*

*New industrial/utility energy development shall meet the highest standards required by law. Permitting authorities shall first consider current and historical land use and the culture of the region, community opinion, economic benefit, as well as the land owner's rights. Any development shall to the extent possible be done so as to mitigate adverse impacts to the region. Any utility-scale energy generation project deemed acceptable by the Public Utility Commission shall include a plan for distributing benefits to the towns in the region proportional to the adverse effects experienced by that town. Long term maintenance, safety issues, decommissioning, and land reclamation procedures required at the end of the energy project's life must also be included in the project plan. TL-GS-4 pp. 57-58*

The Northland solar project could be all or mostly cost and negative impact and little or no benefits. There is no plan to distribute benefits to the town or region proportional to the adverse effects experienced by the town.

*The region has recently experienced a sharp increase in the number of renewable energy applications which will worsen already congested transmission, particularly in the Sheffield-Highgate Export Interface (SHEI), where several existing generators are frequently curtailed by the ISO. While NVDA encourages appropriately scaled renewable energy development, NVDA has a commitment to ensure that such development is sustainable and feasible and does not merely substitute one renewable resource with another. TL-GS-4 p. 58*

The addition of 5 MW of renewable energy in a town and region already producing more energy than can be used indicates that the Northland solar project is not appropriately scaled renewable energy development.

*Regional constraint: NVDA's regional plan has long held that rural areas should receive very little commercial or industrial development unless it occurs in an established industrial park, or in an area specifically designated in the local bylaw or plan as being well suited to such uses. TL-GS-4 p. 59*

There is standing precedent to not build industrial development in rural agricultural areas in the region.

Siting policies for solar:

- *NVDA has determined that the following types of locations in the region should be prioritized for future solar generation. Even though these locations are not shown on the regional solar maps due to a lack of GIS data, these sites should be considered "preferred locations" for siting solar:*

*o Rooftops of structures, residential and commercial. (Our conservative estimates show the region's total potential output from rooftop solar alone could amount to 23.9 MW, or 6.3% of the high end of the LEAP model projections for solar for 2050 of 377.2 MW).*

*o Brownfield sites not located in a designated downtown or village center*

*o Earth extraction sites (e.g. gravel pits, quarries), active or abandoned*  
*o Parking lot canopies and surface parking lots*

*o Farms, where more than 50% of the power generated is used by the farm*

*o Industrial parks, where more than 50% of the power generated is used by the tenants of the industrial park*

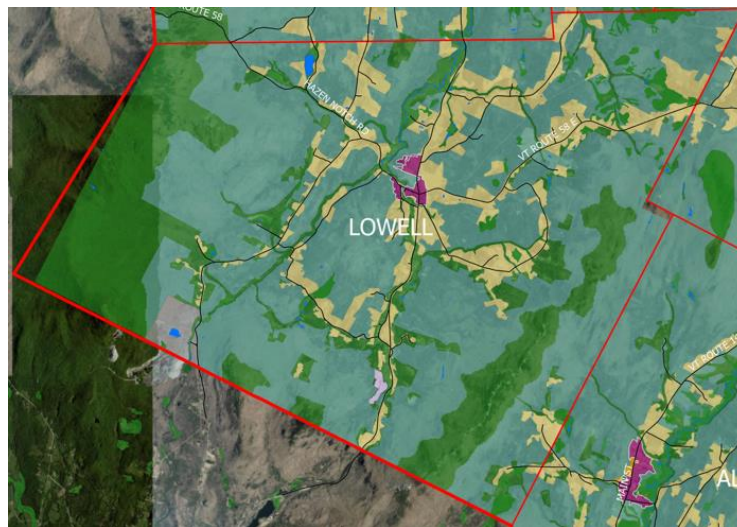
*o Undersized lots and otherwise undevelopable land in existing industrial parks*

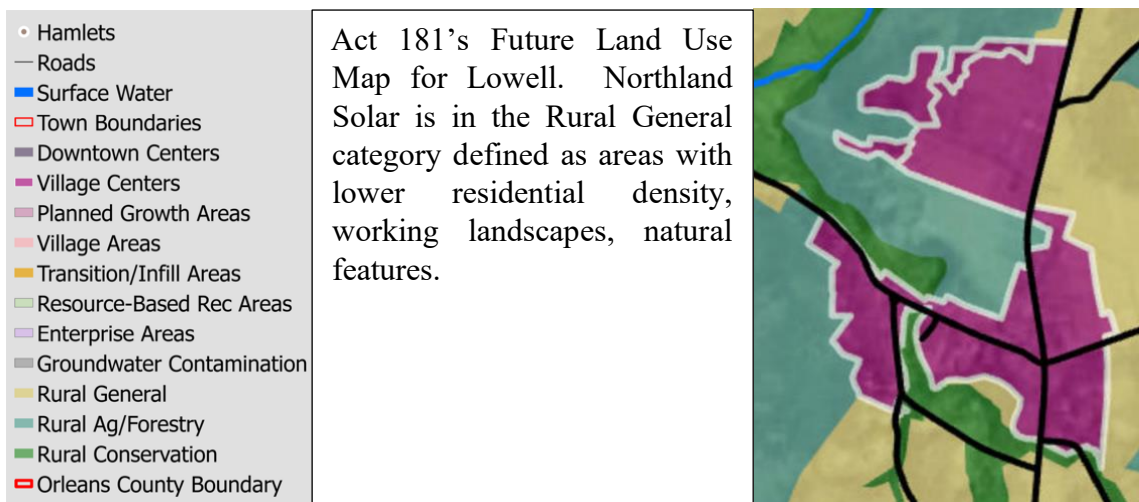
Alternative and preferred solar locations are numerous and should be considered first and part of the planning proposals. The Northland solar site, on prime agricultural land in a Village center, is not a preferred location.

*The Northeast Kingdom has a robust agricultural economy, and NVDA discourages siting ground-mounted solar in a manner that fragments productive agricultural soils, effectively removing farmland from production for decades. TL-GS-4 pp. 60-61*

The Regional Plan does not support siting ground-mounted solar on productive agricultural soils.

**Act 181**, passed into law June 2024, overhauls Vermont's planning framework for coordinating state, regional, and municipal land use. New Future Land Use (FLU) Maps guide development in our region by designating areas for growth, conservation, and other purposes based on environmental, infrastructure, and community factors. After seeking Land Use Review Board (LURB) approval, these maps will be used to determine Act 250 location-based jurisdiction and inform the disaggregation of regional housing targets set by The Department of Housing and Community Development.





<https://nvda.net/files/DraftFluOrleans.pdf>, TL-GW-5

**BCRC Future Land Use Mapping Categories**

- Centers (Downtowns / Villages)** - Traditional and historic mixed-use centers bringing together economic activity and civic assets
- Planned Growth Areas** - mixed-use areas around Centers that can accommodate higher density development
- Village Areas** - historically settled areas near Village Centers, relatively lower density than Planned Growth Areas
- Transition/Infill Areas** - areas where there is potential for development but it is currently limited, areas that could see more strategic infill if the required infrastructure is added
- Resource-based Recreation Areas** - large-scale recreation-related developments like ski resorts, centers of employment or commercial activity
- Enterprise Areas** - locations of high economic activity and employment that are not adjacent to Planned Growth Areas
- Rural - General** - areas with lower residential density, working landscapes, natural features
- Rural - Agriculture and Forestry** - blocks of forest and farmland, home to natural resources, working lands, and scenic beauty
- Rural - Conservation** - areas of significant natural resources that require special protection
- Hamlets** - small historic clusters of homes that may include civic or commercial assets, but not planned for growth; no public utilities

[http://www.bcrvvt.org/uploads/1/1/1/8/111899771/act\\_181\\_summary\\_v2\\_2025.pdf](http://www.bcrvvt.org/uploads/1/1/1/8/111899771/act_181_summary_v2_2025.pdf)

Act 181 establishes new housing targets for every town in Vermont. Lowell’s housing targets are 19 – 28 by 2030 and 60 – 118 by 2050. These goals can most effectively be met by focusing new housing in the Village, as articulated by the Lowell Town Plan

Town	2030 Low End Total	2030 High End Total	2050 Low End Total	2050 High End Total
Albany	33	48	104	204
Barnet	51	75	162	319
<b>Barton</b>	<b>169</b>	<b>250</b>	<b>537</b>	<b>1058</b>
Bloomfield	3	4	9	18
Brighton	56	82	177	348
Brownington	16	24	51	101
Brunswick	1	2	4	7
Burke	96	143	306	603
Canaan	38	57	122	240
Charleston	15	22	46	91
Concord	16	24	51	100
Coventry	31	46	99	196
Craftsbury	40	60	129	254
Danville	100	147	317	624
<b>Derby</b>	<b>284</b>	<b>420</b>	<b>902</b>	<b>1778</b>
East Haven	6	9	19	37
Glover	29	43	93	184
Granby	3	5	10	20
Greensboro	30	44	95	187
Groton	17	26	55	109
Guildhall	9	14	30	60
<b>Hardwick</b>	<b>185</b>	<b>273</b>	<b>588</b>	<b>1158</b>
Holland	10	15	31	62
Irasburg	33	49	105	207
Jay	17	25	54	106
Kirby	6	9	20	40
Lemington	1	2	3	6
Lowell	19	28	60	118
Lunenburg	51	75	160	316
<b>Lyndon</b>	<b>313</b>	<b>463</b>	<b>995</b>	<b>1961</b>
Maidstone	2	3	6	12
Morgan	12	17	37	72
Newark	7	10	22	44
<b>Newport City</b>	<b>303</b>	<b>448</b>	<b>963</b>	<b>1899</b>

[https://nvda.net/files/NEK\\_Housing\\_Targets.pdf](https://nvda.net/files/NEK_Housing_Targets.pdf), TL-GS-6

## Vermont’s 2022 Comprehensive Energy Plan

### SHEI Constraints

*In northern Vermont... subsequent additions of substantial amounts of generation, relative to loads, has resulted in the so-called Sheffield-Highgate Export Interface (SHEI) generation constraint. New renewable generation added here often simply reduces the output of existing renewable generation... Comprehensive Energy Plan, 2022, TL-GS-7 p. 66*

*Development should be steered toward areas of the grid where distributed generation will provide benefit, or at least not increase costs. Comprehensive Energy Plan, 2022, TL-GS-7 p. 266*

Northland Solar increases costs (as demonstrated by the payment to offset those costs) and adds renewable energy to an area that does not need new renewable generation.

## Appropriate Siting

*Siting of energy infrastructure should avoid or minimize conversion of natural lands, and should seek to maintain the ecological functions of the land. Comprehensive Energy Plan, 2022, TL-GS-7 p. 271*

*The net-metering program, governed by 30 V.S.A. § 8010 and PUC Rule 5.100, guides construction of new projects toward sites that reduce environmental impacts through the identification of preferred sites...which include existing or new structures (such as rooftops), parking lot canopies, previously developed parcels, brownfields, landfills, and gravel pits. Comprehensive Energy Plan, 2022, TL-GS-7 p. 252*

The Northland solar project proposes to convert natural lands to commercial/industrial and interfere with ecological functions of the land. The site does not meet a generally accepted definition of a preferred site. Access to a substation with capacity and a transmission line is not defined as appropriate siting.

## Housing

*Any planning process that is viewed as slowing or stalling the growth of housing could challenge today's urgent efforts to address housing needs in Vermont. Comprehensive Energy Plan, 2022, TL-GS-7 p. 145*

*Meeting the urgency by building where capital cost of the development are lowest can result in residential sprawl not aligned to compact centers. Comprehensive Energy Plan, 2022, TL-GS-7 p. 145-146*

Vermont seeks to meet urgent housing needs through planning that align to compact centers.

## Agricultural Land

*It's especially vital that deployment of renewable resources in the name of reducing greenhouse gases doesn't have an overall impact that is counterproductive to that goal, or detrimental to the ecological functioning of Vermont's natural landscapes. Comprehensive Energy Plan, 2022, TL-GS-7 p. 254*

*Policies should continue to favor energy development that avoids and minimizes conversion of natural lands, and reuses or adds new compatible uses to previously developed lands. Comprehensive Energy Plan, 2022, TL-GS-7 p. 254-255*

The Northland solar project would have a detrimental effect on the ecological functioning of Vermont's natural landscapes and convert natural lands in a way that is incompatible with surrounding developed lands.

## Transportation

*Vermont's longstanding land use 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. Chapter 117). Compact and mixed-use development patterns reduce transportation energy use by reducing the distance between daily travel destinations, and by increasing the viability of healthier, more sustainable travel options, such as walking, biking, carpooling, and transit services. What we build and where we build it is a foundational building block of our transportation and energy systems. Comprehensive Energy Plan, 2022, TL-GS-7 p. 139*

*In support of Vermont's land use goal of maintaining the pattern of compact settlements separated by rural countryside, the state has designation programs for village centers, downtowns, and new town centers. Add-on designations for neighborhood development and growth centers convey additional benefits for targeted growth. These designation programs help communities of all sizes plan for development in a way that meets the state's land use goal while addressing local issues such as restoring community vitality, expanding economic development opportunities, financing infrastructure improvements, building complete streets, and creating more housing opportunities near work or transit. Many municipalities have maximized the benefits of these programs by layering multiple state designations. Planning the state's energy future thus depends on local and regional planning entities planning for development within a land use pattern that is compact, mixed-use, and therefore sustainable. Comprehensive Energy Plan, 2022, TL-GS-7 p. 139*

The Town of Lowell's Village "Four Corners" area is essential to meet the state's transportation and development goals as identified in the Comprehensive Energy Plan. It is a compact village center with proven flood resiliency with the potential for mixed-use development that can maximize the benefits to the town and the region with sustainable development.

## CONCLUSION

The Northland Solar Project is 1) incompatible with the rural character of the Village, 2) is inconsistent with the land use goals as set forth in the Town Plan, 3) does not reflect the existing and desired land use pattern of the area or the region, 4) interferes with planned growth for the Village, 5) violates the standards as set forth in the Regional Plan for siting electric generation, 6) adds renewable energy to a Town and Region that cannot utilize the power and 7) does not comply with the Comprehensive Energy Plan for siting, housing, transportation and the ecological functioning of Vermont's natural landscape.

Furthermore, the Northland Solar Project challenges all three tiers of Act 181 in relation to Lowell's Future Land Use planning for future growth in village and rural areas. 1) hampers availability of acreage where Act 250 may or may not apply as outlined in Tier 1. 2) ignores areas that will allow larger lot sizes for new home construction in Tier 2. 3) ignores critical natural resources and wildlife areas in Tier 3. Even with the Land use Review Board contemplating temporary Act 250 housing exemptions through 2027, Northland Solar would

take a huge tract of land that would be of great value to Lowell's Four Corner area where smart growth relating to Tiers 1 and 2 in Act 181 would occur.

Therefore, the proposed Northland Solar Project would unduly interfere with the Orderly Development of the Region.