## **MEMO**



October 2, 2024

Re: Draft Regional Plan first hearing report From: Kevin Geiger, AICP CFM, Chief Planner

TRORC is required by law to create a report detailing how its draft Regional Plan contains the elements of a regional plan as laid out in 24 VSA § 4348a. This report lays out below how the draft plan has met these requirements. Statutory requirements are shown in italics, and our respective responses are below each one.

## **Elements of a Regional Plan**

- (a) A regional plan shall be consistent with the goals established in section 4302 of this title and shall include the following:
- (1) 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.

Policies on land use are primarily found in Chapter 3 on pages 41-52. Policies on services and facilities are found in Chapter 9 on pages 125-132. Policies on natural resources are found in Chapter 6 on pages 83-91.

(2) 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:

Natural resources are largely discussed in Chapter 6 and working lands (agriculture and forestry) in both Chapter 3 as a land use and Chapter 5 as economic sectors. Agriculture as a land use is best supported in the Rural FLUA (see polices on page 48) and forestry in the aptly titled Forest-Based Resource Area (see policies on pages 49-50).

(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.

See Maps 3, 5, and 6.

(A) 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.

See Map 4 and the policies on page 48.

(B)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.

The map on page 30 and Map 5 show these areas. Policies are found in several areas but mostly on pages 49-50.

(D) Encourages preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

See policies on pages 88-89 and pages 97-99.

(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.

See goals, policies, and recommendations on groundwater, surface water and fisheries on pages 83-87.

(3) 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.

This can be found in Chapter 8, the energy maps, and the Appendices.

(4) 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.

This can be found in Chapter 4 and the current and prospective transportation Map 8. And Appendix B.

(5) 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.

This can be found in Chapter 9 and Map 9.

(6) 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.

This can be found in Appendix C.

(7) A statement indicating how the regional plan relates to development trends, needs, and plans and regional plans for adjacent municipalities and regions.

This can be found in Chapter 12.

(8) 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 no 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.

This can be found in Chapter 8. However, the housing targets are not included in the draft as they are not available. Chapter 8 is expected to have significant revision in the next plan iteration when these targets are available.

(9) An 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.

This can be found in Chapter 5.

(10)(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.

This can be found in at the end of the Land Use chapter on pages 34-40 and goals, policies, and recommendations on pages 51-52.

- (11) A future land use element, based upon the elements in this section, 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 using the following land use categories:
- (A) 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. (B) Planned growth areas. These areas include the 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.
- (C) Village areas. 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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (b) The various elements and statements shall be correlated with the land use element and with each other. The maps called for by this section may be incorporated on one or more maps, and may be referred to in each separate statement called for by this section.
- (c) The regional plan future land use map shall delineate areas within the regional planning commission's member municipalities that are eligible to receive designation benefits as centers and neighborhoods when the future land use map is approved by the Land Use Review Board per 10 V.S.A. §

- 6033. The areas eligible for designation as centers shall be identified on the regional plan future land use map as regional downtown centers and village centers. The areas eligible for designation as neighborhoods shall be identified on the regional plan future land use map as planned growth areas and village areas in a manner consistent with this section and chapter 139 of this title. This methodology shall include all approved designated downtowns, villages, new town centers, neighborhood development areas, and growth centers existing on December 31, 2025, unless the subject member municipality requests otherwise.
- (d) With the exception of preexisting, nonconforming designations approved prior to the establishment of the program, the areas eligible for designation benefits upon the Land Use Review Board's approval of the regional plan future land use map for designation as a center shall not include development that is disconnected from a downtown or village center and that lacks an existing or planned pedestrian connection to the center via a complete street.
- (e) The Vermont Association of Planning and Development Agencies shall develop, maintain, and update standard methodology and process for the mapping of areas eligible for Tier 1B status under 10 V.S.A. § 6033 and designation under chapter 139 of this title. The methodology shall be issued on or before December 31, 2024, in consultation with the Department of Housing and Community Development and Land Use Review Board.

TRORC has not changed its Land Use chapter to incorporate the requirements of this new plan element above as guidance on how to do so is still in development. TRORC will revise the plan in 2025-2026 to address this by the December, 2026 deadline.

## **State Planning Goals**

TRORC is required by law to create a report detailing how its draft Regional Plan is consistent with the state planning goals in 24 VSA  $\S$  4302. This report lays out how the draft plan has met this requirement below.

## § 4302. Purpose; goals

- (a) General purposes. It is the intent and purpose of this chapter 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.
- (b) 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.

This can be found in the Introduction, specifically on pages 3-5 and in Chapter 12.

(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.

This can be found on page 174 and many areas of the plan.

(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.

This is sound planning practice and supported throughout the plan.

(4) To encourage and assist municipalities to work creatively together to develop and implement plans.

This can be found in Chapter 12 on page 174 and many areas of the plan.

- (c) In addition, this chapter shall be used to further the following specific goals:
- (1) To plan development so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside.

This can be found in the overall land use goals on page 41.

(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.

This can be found in the policies around the Regional Growth Areas (Regional Centers, Town Centers, and Village Settlements) on pages 41-43.

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

This can be found in policy 2 on page 41.

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

This can be found in policy 1 on page 125.

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

Smart growth is referenced in several background narratives (land use, energy, homes, and transportation) and is covered in the overall land use goals on page 41.

(2) To 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.

This can be found in goals, policies, and recommendations on page 72.

(3) To broaden access to educational and vocational training opportunities sufficient to ensure the full realization of the abilities of all Vermonters.

This can be found in goal 2 and policy 2 on page 127.

(4) To 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.

This can be found in goals, policies, and recommendations on groundwater, surface water and fisheries on pages 60-62.

(A) Highways, air, rail, and other means of transportation should be mutually supportive, balanced, and integrated.

This can be found in goals, policies, and recommendations on groundwater, surface water and fisheries on pages 60-62.

- (5) To identify, protect, and preserve important natural and historic features of the Vermont landscape, including:
- (A) significant natural and fragile areas;

This can be found in pages 88-89.

(B) outstanding water resources, including lakes, rivers, aquifers, shorelands, and wetlands;

See goals, policies, and recommendations on groundwater, surface water and wetlands on pages 83-87.

(C) significant scenic roads, waterways, and views;

This can be found on pages 98-99.

(D) important historic structures, sites, or districts, archaeological sites, and archaeologically sensitive areas.

This can be found in goals, policies, and recommendations on pages 97-98.

(6) To maintain and improve the quality of air, water, wildlife, forests, and other land resources.

This can be found in the Chapter 6 goals.

(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).

Sound planning to support natural resources is found in several place, but most of this is in Chapter 6.

(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.

This can be found in goals, policies, and recommendations on groundwater, surface water and fisheries on pages 60-62.

(C) Vermont's forestlands should be managed so as to maintain and improve forest blocks and habitat connectors.

This is best supported on pages 49-50 of the plan.

(7) To make efficient use of energy, provide for the development of renewable energy resources, and reduce emissions of greenhouse gases.

This can be found in goals, policies, and recommendations on pages 157-161.

(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.

This can be found in goals, policies, and recommendations on pages 157-161.

(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.

See policy 1 on page 161.

(8) To maintain and enhance recreational opportunities for Vermont residents and visitors.

This can be found on page 131. Recreation is also supported in Chapters 2, 3, 5, and 6.

(A) Growth should not significantly diminish the value and availability of outdoor recreational activities.

This can be found on page 131.

(B) Public access to noncommercial outdoor recreational opportunities, such as lakes and hiking trails, should be identified, provided, and protected wherever appropriate.

This can be found in policy 1 on page 84 and policy 1 on page 131.

(9) To encourage and strengthen agricultural and forest industries.

This can be found in recommendations 8, 9, and 10 on pages 72-73.

(A) Strategies to protect long-term viability of agricultural and forestlands should be encouraged and should include maintaining low overall density.

This can be found in recommendations 8, 9, and 10 on pages 72-73, and recommendation 6 on page 14.

(B) The manufacture and marketing of value-added agricultural and forest products should be encouraged.

Value-added ag and forestry products is covered in several chapters and supported in recommendation 8 on page 72.

(C) The use of locally-grown food products should be encouraged.

This can be found in Chapter 2 on page 14.

(D) Sound forest and agricultural management practices should be encouraged.

This can be found in policy 4 on page 49 for forestry practices.

(E) Public investment should be planned so as to minimize development pressure on agricultural and forest land.

This can be found in goal 2 and policy 3 on page 125.

(10) To 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.

This can be found in recommendation 1 on page 91.

- (11) To 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.

This is addressed in pages 113-115. Housing targets are not yet available.

(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.

This is supported in policy 3 on page 113.

(C) Sites for multifamily and manufactured housing should be readily available in locations similar to those generally used for single-family dwellings.

Support to meet this can be found on pages 113-115.

(D) Accessory dwelling units 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.

Regional plans do not go to local zoning detail, but ADUs are supported in the plan.

(12) To plan for, finance, and provide an efficient system of public facilities and services to meet future needs.

Goal 1 and policy 1 on page 125 support this.

(A) Public facilities and services should include fire and police protection, emergency medical services, schools, water supply, and sewage and solid waste disposal.

This can be found in Chapter 9.

(B) The rate of growth should not exceed the ability of the community and the area to provide facilities and services.

This can be found in the goals on page 125.

(13) To ensure the availability of safe and affordable childcare 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.

Background can be found on this on pages 120-122, and goals, policies, and recommendations on page 128.

- (14) To encourage flood resilient communities.
- (A) New development in identified flood hazard and river corridor protection areas should be avoided. If new development is to be built in such areas, it should not exacerbate flooding and fluvial erosion.
- (B) The protection and restoration of floodplains and upland forested areas that attenuate and moderate flooding and fluvial erosion should be encouraged.
- (C) Flood emergency preparedness and response planning should be encouraged.

This can be found in part C on pages 34-40 and goals, policies, and recommendations on pages 51-52.

(15) To equitably distribute environmental benefits and burdens as described in 3 V.S.A. chapter 72.

This is a new planning goal. TRORC believes that its plan and the resulting landscape does not burden any group or location disproportionately.

Note: Regional planning commissions are required under 24 VSA § 4348(b) to submit the draft plan to the Land Use Review Board, but that does not exist yet. Regional planning commissions are also required under 24 VSA § 4348(d)(2) to notify our member municipalities of any changes to the Future Land Use map, and information about the new 'Tier structure' under 10 VSA Chapter 151. TRORC is not making any changes to the Future Land Use map at this time as guidance is still forthcoming. We are also not proposing any 'tiers' at this time. The methodology for creating Tier 1B areas is not available until 2025. The next iteration of the Regional Plan, beginning later in 2025 will propose 'tiers'.

TRORC is also required to state how the draft is in conformance with the new Chapter 139 of Title 24. However, that chapter primarily creates definitions and programs, versus regional plan elements or goals we must be consistent with. We look forward to guidance in the next two years how this conformance will be judged.