

TRORC 2026 REGIONAL PLAN — HEARING REMARKS & FORMAL WRITTEN COMMENTS

Michelle Massa, Chair, Vershire Planning Commission

Bradford (July 29) / White River Junction (July 30), 2026

Submitted to: TRORC (regionalplan@trorc.org) and LURB (act250.board@vermont.gov)

PART 1 — FORMAL WRITTEN COMMENT

Submitted for the record — Bradford, July 29, 2026

Executive Summary

These comments raise ten documented concerns with the TRORC 2026 Regional Plan and the process that produced it. Each is supported by the public record and personal experiences. A detailed analysis follows in Sections 1–10 below.

- 1. Regulatory overreach.** The plan uses “shall” and “must” 273 times across the full 210-page plan. I contend that TRORC has no regulatory authority of its own under Vermont statute. The mandatory language is functionally misleading and legally contested.
- 2. Land use math.** Only 2.4% of the 30-town region is designated for meaningful growth or economic activity. Over 83% is classified as Rural Conservation or Rural Agriculture/Forestry. The plan simultaneously demands 2,424–3,640 new housing units by 2030 in areas too restricted to accommodate them.
- 3. Parcel-level data withheld.** A parcel-level reclassification map was not proactively shared with member towns or landowners. Affected property owners cannot easily assess the regulatory impact on their land without staff assistance navigating an unlabeled ambiguous GIS tool.
- 4. Conflict with Vershire Town Plan.** The regional plan reclassifies a huge percentage of our land into rural-AF plus an estimated 41% of Vershire as Rural Conservation—directly undermining Vershire’s September 2025 town plan, which TRORC itself approved in December 2025. Under 24 V.S.A. §4302F(2), TRORC must identify, justify, and resolve this conflict.
- 5. Environmental justice failure.** The plan claims environmental justice compliance but includes no spatial analysis identifying which communities and parcels bear the greatest burden of restriction. This is not a technical omission—it is a substantive gap in the plan’s equity framework that must be addressed by sharing parcel-level data and list of reclassifications by parcel.
- 6. Inadequate process to date.** The Vershire PC received 210 pages on June 29 with an August 1 deadline—33 days in July. [that deadline was since extended 1 week] TRORC’s claimed engagement credit for a July 9, 2025 routine PC meeting in their [Outreach Summary document](#), however it was not a real public forum, they used early working draft maps, and produced a promised January 2026 review in the meeting minutes that never occurred.
- 7. Inadequate process ahead.** The second draft—incorporating all public comment—receives one public hearing. No individual town meetings are planned. The public has not been told how many days it will have to review the revised draft before that hearing.
- 8. Pattern of conduct.** TRORC’s failures toward Vershire are not isolated. Promised bylaws assistance was never delivered – unless we had a contract and funding. Housing target methodology was withheld until threatened with a PRR. LURB itself stated at its July 21 special meeting that it cannot confirm whether adequate public engagement has occurred. I submit that it has not even come close when compared to what other RPCs have done to date.

- 8A. TRORC is not an independent actor.** Approximately 95% of TRORC's operating budget comes from ACCD contracts and federal grants—not from member towns. TRORC is a dues-paying member of VAPDA, which retained the Necrason Group to lobby the Vermont Legislature on land use in the same biennium it produced this plan. All four VAPDA lobbyists are registered for "Land Use" with the Vermont Secretary of State. LURB should weigh this plan knowing its author has institutional interests in the outcome.
- 9. Internal contradictions.** The plan calls for universal cellular coverage and restricts tower siting for aesthetic reasons. It declares a housing crisis and mandates no primary fossil fuel heating and EV charging infrastructure for new development. These are not policy tensions—they are unresolved contradictions in a 210-page document full of staff's pet projects and ideologies.
- 10. Parcel objection — 36 Parker Road.** My property is incorrectly designated Rural Agriculture/Forestry. It is adjacent to Parker Road and Route 113 and is appropriately Rural General. I formally request correction of this designation for entire parcel of 161 acres.

My name is Michelle Massa. I am Chair of the Vershire Planning Commission and a landowner with 161 acres enrolled in Vermont's current use program. These comments are submitted in my official capacity as Planning Commission Chair for inclusion in the formal record before TRORC and the Land Use Review Board.

1. Regulatory Authority — A Direct Contradiction

TRORC's own website states — and I am quoting directly — that "the Plan has no regulatory authority of its own." It then states in the same paragraph that the plan is used by the District Environmental Commission in Act 250 review, and that the Public Utility Commission gives the plan's policies "substantial deference."

[Note: this content maybe have since been removed or changed on their website; this was captured about 1-2 weeks ago]

Solve this Riddle...

WHAT IS THE TRORC REGIONAL PLAN?

The Two Rivers-Ottawaquechee Regional Plan is a set of goals, policies, and recommendations by the Regional Commission. This Plan, like municipal plans, must be crafted to be consistent with the [State planning goals](#) and it must have [several elements](#). Its purpose is to give guidance to TRORC itself, as well as developers, non-profits, municipalities, and others as we all work toward a safe, healthy, and prosperous region. The Regional Plan's [Introduction chapter](#) provides a detailed overview of the Plan and what it does.

The current Regional Plan was adopted on February 26, 2025.

Adoption of the Plan does not change the structure or role of local or State governments. The Plan has no regulatory authority of its own, but it is used by the:

- [District Environmental Commission #3](#) in [Act 250](#) development review, and
- Public Utility Commission in [Section 248](#) reviews of energy projects and [Section 248a](#) review of telecommunications towers

The Plan has been reviewed by the Vermont Department of Public Service and been granted a [Certificate of Energy Planning Compliance](#). This ensures that the Public Utility Commission will give the Plan's policies substantial deference during their review of projects.

Then why 273 "Musts" & "Shalls" ???

This plan contains 273 instances of "shall" and "must" across the full 210-page plan. Under Act 250 Criterion 10, when a project is reviewed for consistency with the regional plan, those mandatory provisions have binding effect. When the Public Utility Commission gives this plan "substantial deference" on energy projects, those mandates have real consequences for real landowners.

"No regulatory authority of its own" is technically accurate in the narrowest sense, however it is functionally misleading. This plan prohibits fossil fuel heating for new Act 250 projects; it mandates EV chargers for parking lots with five or more spaces; it bars new commercial development on gravel roads; it caps on-farm social events at 20 per year. These are not aspirational goals — they are enforceable constraints — and Two Rivers knows it.

I note for the record that Two Rivers' own executive director, Peter Gregory, responded to the July 2024 Walsh ruling by stating publicly that mandatory language would prevail if courts found it unambiguous. The 273 mandates in this draft are the direct result of that response. They are a deliberate *choice*, not a requirement of Act 181.

2. The Land Use Math Does Not Add Up

Two Rivers' own regional percentage breakdown [on their interactive map](#) shows the following distribution of land across the 30-town region:

- *Downtown/Village Center: 1%*
- *Village Area: 0.5%*
- *Planned Growth Area: 0.3%*
- *Transition Area: 0.3%*
- *Enterprise Area: 0.3%*

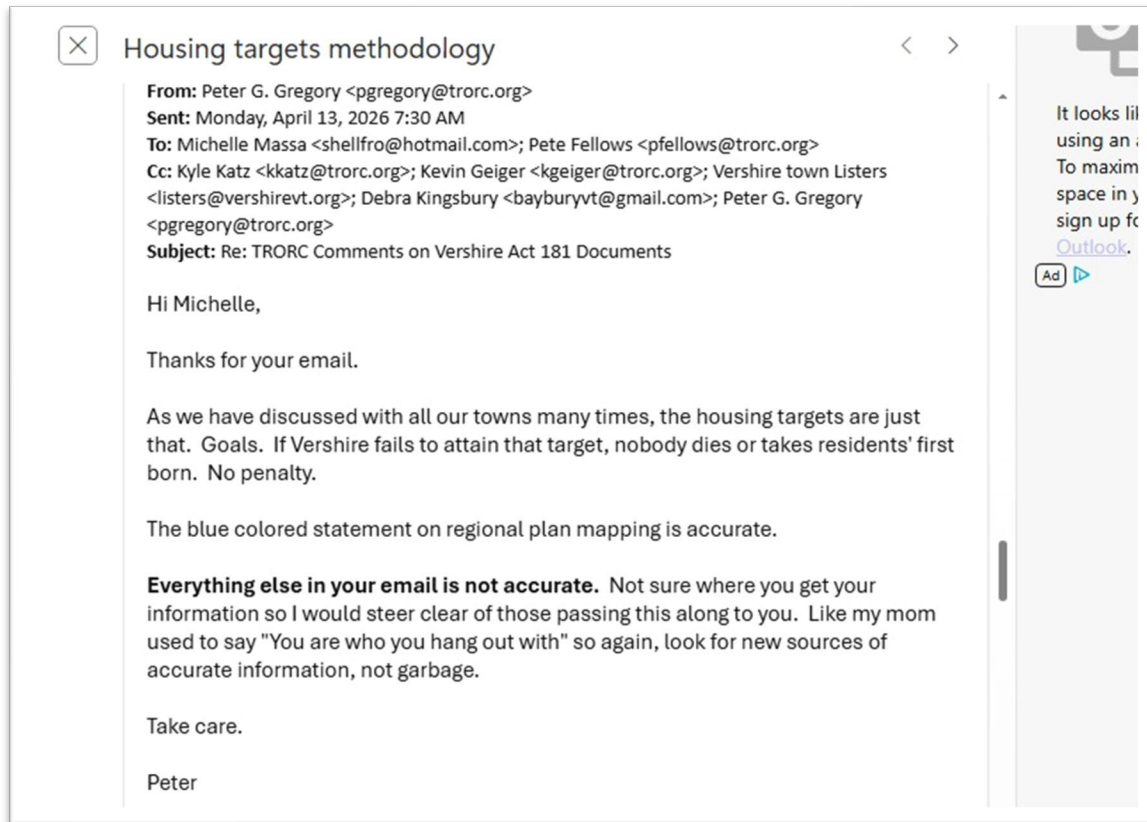
Total land designated for meaningful growth, commercial activity, or economic development: approximately **2.4% of the region.**

The Enterprise Area — the only category designed for commercial and industrial uses — represents 0.3% of the entire region — for 30 towns. If a municipality wants to attract a business, create jobs, or expand its tax base, this plan offers 0.3% of regional land to do it in.

Meanwhile, Rural Conservation — the most restrictive category — covers 35% of the region (and even more for Vershire, largely due to one landowner holding a massive amount of land in conservation). Rural Agriculture and Forestry covers 48% regionally. Combined, over 83% of the region is in categories where commercial activity is either prohibited or severely restricted.

Two Rivers is simultaneously asking these same rural areas to absorb a substantial majority of the region's 2,424 to 3,640 new housing units by 2030 — in Village Centers that total 1% of the region, many of which lack water and wastewater infrastructure to support that density. The math does not work. LURB has already said it cannot confirm the housing element conforms with statute.

Further, when I asked repeatedly in formal communications for the math and methodology to support the goal of adding 30 units to little Vershire, I was met with condescending and unprofessional behavior that I submit here for the record and will file a separate complaint on, along with other town officials who have also been treating very poorly by TRORC leadership. For example:



3. Parcel-Level Data — Buried, Not Shared

My best estimate is that approximately 41% of Vershire's land is now designated Rural Conservation — significantly above the regional average of 35%, and with direct implications for Act 250 review of any future development. I cannot confirm that figure because TRORC hasn't shared the data at the town-level, only the aggregate at regional level. Neither can any Vershire landowner, selectboard member, or planning commissioner — which is part of my objection and call for more detailed information.

A parcel-level map does exist. It is linked on Two Rivers' website under Map 3 as "[Future Land Use Areas — Online Map \(more detailed with parcels\)](#)" — in parentheses, with no further description, buried in a list of 14 maps. It came to my attention only because a Two Rivers staff member pointed to it verbally at the Fairlee informational session on July 17. After that session, Two Rivers added the parenthetical clarification to the link — an implicit acknowledgment that the original presentation was inadequate.

I work professionally in web interface design and user experience. I could not find this resource on my own. Meaning, the general public had no chance. A parcel-level reclassification tool that requires staff intervention to locate is not public notice; it is not meaningful engagement. It is a legal checkbox.

Before the second hearing draft is released, I submit that Two Rivers must proactively share parcel-level reclassification data with each of its 30 member towns — in a format that individual landowners can actually use — along with a clear explanation of what each designation means for Act 250 review of their property.

4. Compatibility with the Vershire Town Plan — 24 V.S.A. §4302F(2)

Two Rivers approved the [Vershire Town Plan](#) on December 3, 2025. The motion was made by Vershire's TRORC commissioner. That plan — adopted by Vershire voters on September 27, 2025 — contains explicit

language encouraging small agricultural enterprises, eco-tourism, agritourism, value-added farm products, and a landowner's right to a reasonable and customary economic return from their land.

The 2026 Regional Plan now before this board reclassifies a huge percentage of land from rural-general into rural-AF and classifies an estimated 41% of Vershire's land into Rural Conservation — a category that caps farm social events at 20 per year, restricts accessory on-farm commercial activity, and triggers Act 250 review at 2,000 square feet. The Vershire Town Plan says farm enterprise is encouraged in rural areas, yet the regional plan effectively restricts it.

Under 24 V.S.A. §4302F(2), where a regional plan reduces the desired effect of an adopted municipal plan, the regional planning commission must identify that conflict, explain why it is necessary, show that no reasonable alternative exists, and describe mitigation. That explanation is not present anywhere in this document. I am formally requesting it on the record.

Two Rivers' own [2022 Strategic Plan](#) commits to serving member towns as a "coach" and to using regional plan updates as "a platform for deepening town-TRORC relationships." Approving a town plan in December and reclassifying nearly half its land three months later — without notice, without explanation, and without the disclosure required by statute — is not coaching. It is the opposite.

Strategy 1: The Commission will redouble TRORC's investment in working with towns.

From one Regional Plan to the next (2012, 2015 and 2020), TRORC began greater investment in its role as "coach" to encourage improved town planning. It is time to consolidate the gains made from this investment and be strategic about the next phase of such programming.

5. Environmental Justice — Missing Spatial Analysis

A spatial analysis, in Vermont's Environmental Justice framework, is a map-based assessment that identifies which communities bear the greatest environmental burdens — restricted land use, flood risk, development constraints — and which receive the greatest environmental benefits. It is specifically designed to answer the equity question: who pays, and who benefits? TRORC has not conducted this analysis. LURB flagged it as formal non-conformance.

The connection to parcel-level data here is direct. Without knowing which specific parcels are being reclassified and into which category, it is impossible to assess whether the burdens of restriction are distributed fairly — across income levels, landowner types, or communities. A Rural Conservation designation applied to a 5,000-acre holding has a fundamentally different impact than the same designation applied to a family's 20-acre working farm. Without parcel-level disclosure, that distinction is invisible — and the equity question cannot be answered.

Meaningful civic participation means being told what is happening to your land — not being expected to locate an unlabeled link on a website, navigate a GIS interface, and independently deduce the regulatory consequences for your property. That is not participation. That is the appearance of participation. Two Rivers staff must come to each member town, present these specific Future Land Use maps (not the early draft versions they shared in July 2025; THESE maps), explain what each category means for Act 250 review, and give landowners a real opportunity to understand what is being proposed and raise objections. Anything short of that fails the standard Vermont law sets.

6. Adequacy of Process to Date

The Vershire Planning Commission received 210 pages of draft plan materials on June 29, 2026, with an original comment deadline of August 1. Thirty-three days amid summer vacations and prime farming season in July, for a plan that reclassifies parcels across 30 towns with direct Act 250 consequences.

Two Rivers holds up the July 9, 2025 Vershire Planning Commission meeting as its process credit for meaningful engagement with Vershire. The documentary record contradicts that claim on three independent grounds.

First, the maps. The Vershire PC minutes from that meeting describe the presentation as “working draft maps” of the proposed future land use areas. The maps themselves — copies left with the PC secretary and [included in those minutes](#) — are dated July 9, 2025 and titled “2025 Regional Plan Update.” They are not the maps in the 2026 draft now before this Board. Two Rivers’ own outreach summary (dated June 11, 2026) acknowledges that those July 2025 PC meetings presented “the initial regional future land use map,” and that after those meetings, external comments “led to map revisions” and TRORC staff made “dozens of minor changes.” Two Rivers’ own senior planner, Kevin Geiger, signed a memo dated June 27, 2026 documenting changes across all seven land use categories between the maps shown to Vershire in 2025 and the maps now before this Board. A meeting held on maps that subsequently changed in every single category is not process credit for the plan now under review.

Second, the nature of the meeting. The July 9, 2025 session was a routine Vershire Planning Commission business meeting. No public notice was issued inviting landowners or residents to attend and comment on the maps. No comment mechanism was provided. Nothing in the meeting minutes suggests this was intended as a public input session on the future land use reclassification. Had Two Rivers asked the PC to notice the meeting as a public engagement opportunity — to invite landowners to attend, see what was being proposed for their land, and ask questions — we would have done so. They did not ask; the meeting was not designed for public participation, and it produced none.

Third, the follow-up that never came. The [Vershire PC minutes from that meeting](#) document Kyle Hansen — TRORC’s regional planner and the sole TRORC presenter that evening — closing his presentation with this statement: “The TRORC will do its review in January 2026.” That review never happened. No Vershire-specific meeting appears anywhere in 2026 in Two Rivers’ own Regional Plan Outreach Summary — not in January, not in any month. The maps were being revised throughout early 2026 — the TRORC Board discussed land use chapters at meetings in January, February, March, and April 2026 — but Vershire was engaged at none of those revisions.

24 V.S.A. §4348(a) requires regional planning commissions to solicit participation “at the outset of the planning process and throughout the process” through working sessions designed to “allow for meaningful participation” and “provide consistent information about new statutory requirements.” One meeting in July 2025, on preliminary maps that were then materially revised, does not satisfy the “throughout the process” standard. I also note for the record that Two Rivers’ own outreach summary acknowledges Vershire was “inadvertently left off” the list of towns notified about the Tier 1B designation process — a separate, documented process failure in the same document TRORC is citing as proof of adequate engagement.

The Land Use Review Board, at its July 21 special meeting, stated it cannot confirm whether adequate public engagement has occurred yet. I am placing two questions on the record for Two Rivers to answer before August 10:

- First, did Two Rivers hold individual meetings with all 30 member towns to review the revised Future Land Use maps in the current 2026 draft — and if so, when?
- Second, how does a July 2025 meeting on preliminary maps, at a routine Planning Commission meeting not noticed for public engagement, satisfy the §4348(a) requirement for working sessions “throughout the process”?

7. Adequacy of Process Yet to Come

Two Rivers' website describes the following timeline: comments close August 10, a Responsiveness Summary published by end of August or early September, a second hearing draft for one public hearing in late September, and adoption in October.

The second draft — the one that incorporates all public comments and LURB feedback — receives one public hearing with no individual town meetings announced. The public has not been told how many days they will have between the release of the second draft and that hearing. This is the most consequential document in the process and it is receiving the least public engagement.

I am placing two specific questions on the record that I am asking Two Rivers to answer before August 10:

- First: how many days will the public have between the release of the second hearing draft and the late September hearing? Will Two Rivers hold individual town meetings on the revised Future Land Use maps before the adoption vote?
- Second: will the Responsiveness Summary publish the full text of every written comment received, with attribution — or will comments be characterized and summarized at Two Rivers' discretion? What is the statutory basis for the format Two Rivers intends to use?

8. Pattern of Conduct Toward Member Towns

The concerns documented above are not isolated to a single chapter or a single provision. They reflect a pattern of conduct in how Two Rivers engages with its member towns — a pattern that is documented in Vershire's own experience and validated by an independent statewide assessment commissioned under the very statute this plan implements.

First, on the housing targets. In an April 13, 2026 email to Vershire's Planning Commission Chair — copied to Two Rivers senior staff — Executive Director Peter Gregory wrote: "the housing targets are just that. Goals. If Vershire fails to attain that target, nobody dies or takes residents' first born. No penalty." Two Rivers' own Executive Director confirmed in writing that these targets are aspirational and carry no penalty. Yet this plan uses 273 mandatory "shall" and "must" provisions to structure land use around achieving them. That is a direct contradiction within Two Rivers' own communications, and LURB should weigh it accordingly. That email is submitted as Exhibit A.

In the same email, when Vershire's PC Chair asked — repeatedly and in writing — for the methodology behind the housing target of 30 new units for Vershire by 2030, Mr. Gregory responded: "Everything else in your email is not accurate. Not sure where you get your information so I would steer clear of those passing this along to you... look for new sources of accurate information, not garbage." As cited above, that is Two Rivers' documented response to a member town official asking a legitimate planning question on the record. LURB should have full visibility into the working relationship between this commission and its member towns, and it is appalling.

Second, on the bylaws assistance. Following Vershire's town plan adoption in September 2025, our Planning Commission asked Two Rivers for assistance updating our development ordinance to align with Vermont statute. Two Rivers staff informed us — with less than one week's notice — that a grant deadline had already passed and we had missed the window. Staff then offered a "desk review" as an alternative. Two Rivers subsequently produced an extensive body of edits. When Vershire's Planning Commission analyzed those edits and returned a structured response distinguishing what was statutorily required from what was discretionary, Two Rivers staff responded that our analysis now "goes beyond a desk review" and would require a paid contract. Two Rivers produced the edits, and on behalf of my group, I analyzed them. Two Rivers then required payment for responding to their own work. That is not technical assistance to a member town. That is a consulting business model applied to a governmental function.

Third, independent validation. The [VAPDA/NADO Research Foundation assessment](#) — completed in February 2025 and submitted to the legislature under Act 181 Section 50a — found that Vermont RPCs "are often treated as consultants or contractors," a finding noted during interviews with RPC executive directors themselves. The same report's accountability recommendations call for RPCs to "lead transparent and inclusive conversations to support overwhelmed municipalities... ensure follow-through on any RPC offers or municipality requests." Vershire's documented experience with Two Rivers reflects the gap between that standard and current practice.

LURB's review authority is not limited to the text of the plan. The public engagement process — and the conduct of Two Rivers toward the member towns it is obligated to serve — is squarely within the scope of this review.

8A. TRORC Is Not an Independent Actor

TRORC cannot be characterized as an independent regional planning body in any meaningful sense. Approximately 95% of its operating budget comes from ACCD contracts and federal grants — not from the member towns it purportedly serves. At the same time, TRORC is a dues-paying member of the Vermont Association of Planning and Development Agencies (VAPDA), which retained the Necrason Group to lobby the Vermont Legislature on land use during the 2025–2026 biennium — the same biennium in which TRORC produced this plan. All four Necrason Group lobbyists listed on VAPDA's employer disclosure are registered for "Land Use" as a subject matter with the Vermont Secretary of State.

TRORC's institutional survival depends on maintaining favorable relationships with ACCD and with the legislative environment that VAPDA is actively working to shape. This is not independence — it is a structural conflict. LURB should weigh this plan's provisions with full awareness that its author has institutional interests in outcomes, and is neither financially independent of the state nor organizationally neutral on the land use questions this plan decides.

9. A Plan of Contradictions

This plan contains internal contradictions so fundamental they raise the question of whether it was reviewed as a coherent whole before being submitted to public hearing.

Universal cellular coverage is stated as a regional goal. The same plan contains 15 enumerated policies restricting tower siting for aesthetic and environmental reasons — with no policies directed at achieving coverage. LURB Chair Janet Hurley noted this directly at the July 21 special meeting: you cannot commit to universal coverage and simultaneously prohibit the infrastructure required to deliver it.

Affordable housing is cited as a regional crisis requiring urgent action. The same plan mandates no fossil fuels as a primary heating source and EV chargers for any Act 250 housing development — requirements that add thousands of dollars per unit to construction costs in a region already defined by affordability constraints. You cannot declare a housing emergency and simultaneously raise the cost of building housing.

Two Rivers' own current Strategic Plan describes the commission's role as that of a "coach" to member towns. That is their word. Not director. Not dictator. "**Coach**" ([see pages 5, 24, and 35](#)). The same organization has produced a plan containing 273 mandatory "shall" and "must" provisions applied to land use across 30 towns. Coaches do not mandate; they guide, they advise, they help. They do not write 273 binding rules and call it advocacy for member towns.

Strategy 1: The Commission will redouble TRORC's investment in working with towns.

From one Regional Plan to the next (2012, 2015 and 2020), TRORC began greater investment in its role as “coach” to encourage improved town planning. It is time to consolidate the gains made from this investment and be strategic about the next phase of such programming.

These are not nuanced policy tensions; they are contradictions embedded in the document itself — unresolved and unexplained in a 210-page plan that had years to resolve them. That is not a drafting gap; it is a deliberate choice to strangle any economic will from our little rural towns.

10. Specific Parcel Objection — 36 Parker Road, Vershire

I submit this section in my individual capacity as a property owner and Vershire taxpayer, separate from my role as Planning Commission Chair. I created a [FLU map explainer doc](#) for my community since Two Rivers is either unable or unwilling to explain things clearly to their general audiences.

My property at 36 Parker Road, Vershire, is currently designated Rural Agriculture and Forestry in the 2026 draft regional Future Land Use Map. I formally object to that designation and request that my parcel be classified Rural General. My property is adjacent to Parker Road and the Route 113 corridor — a corridor the draft regional plan itself maps as Rural General. Designating the corridor Rural General while classifying the working land immediately alongside it as Rural Agriculture and Forestry is internally inconsistent; the plan draws a line between the road and the land that runs beside it without explanation or justification.

Rural General is the appropriate designation for this property. It supports the range of farm and agriculture-based enterprises, accessory commercial uses, and small-scale development that are consistent with rural character — the same uses the Vershire Town Plan actively encourages. Rural Agriculture and Forestry imposes greater restrictions on those same activities: it triggers Act 250 jurisdiction at lower development thresholds and, through the state's Accepted Agricultural Practice framework, limits accessory on-farm social events to 20 per year. These are not hypothetical constraints; they are regulatory consequences that flow directly from the designation.

My parcel objection also illustrates the broader problem documented in Section 3 of these comments. Vershire is among the most comprehensively reclassified towns in the TRORC region under this draft, with changes applied across all eight Future Land Use amendment categories. Yet the parcel-level data that would allow individual landowners to understand exactly what that reclassification means for their property — which parcels moved, which category they moved from and to, what regulatory consequences follow — has never been made publicly accessible in any usable form. I learned about the designation of my own parcel only because I am the Planning Commission Chair and I dig in. Most Vershire landowners have no such ability or knowledge this process is even happening.

I formally request that the 2026 regional Future Land Use Map be amended to designate my parcel at 36 Parker Road, Vershire, as Rural General — consistent with the adjacent corridor designation, consistent with the Vershire Town Plan, and consistent with the agricultural and rural-enterprise future this property has supported for decades. Per 24 V.S.A. §4302F(2), where a regional plan provision reduces the desired effect of a duly-adopted municipal plan, the regional planning commission must explain why the conflict exists, demonstrate that no reasonable alternative was

available, and describe measures to mitigate the reduction. No such explanation, demonstration, or mitigation has been provided for this designation.

For a plain-language explanation of what each Future Land Use designation means, how Vershire's map changed from 2025 to 2026, and what the regulatory consequences are at the parcel level — including 36 Parker Road as a specific example — see the [Vershire FLU Map Explainer](#) I prepared as a public resource. That document, along with five others I have produced to fill the information gap TRORC left, is listed in the Appendix to these comments.

Formal Requests

I am formally requesting that Two Rivers and LURB take the following actions before the October adoption vote:

- 1. Release parcel-level reclassification data** for all 30 member towns in a publicly accessible, clearly labeled format — proactively, not on request.
- 2. Hold individual town meetings** on the revised Future Land Use maps before the second hearing draft is finalized.
- 3. Publish all written public comments** in full, with attribution, as part of the Responsiveness Summary.
- 4. Disclose the specific timeline for the second draft** — including the release date and the number of days between release and the September hearing — before the August 10 comment deadline.
- 5. Provide a written explanation**, as required by 24 V.S.A. §4302F(2), of every instance where the regional plan conflicts with an adopted municipal plan — including Vershire's — and demonstrate that no reasonable alternative exists.
- 6. Revise the plan's mandatory "shall/must" language** to reflect the advisory role of a regional planning commission under Vermont statute, consistent with the standard set by the Northwest Regional Planning Commission — the only Act 181 plan to receive LURB certification.
- 7. Acknowledge and address the documented pattern** of inadequate engagement with member towns, including providing advance notice of grant deadlines, following through on desk review commitments without converting them to paid contracts, and responding to member town inquiries with the professionalism that public officials and Vermont statute require — conduct consistent with the accountability standards identified in the February 2025 VAPDA/NADO statewide RPC assessment, which was commissioned under Act 181 itself.
- 8. Seek a legal opinion on whether S325's one-year extension provision applies to this plan** — and if so, invoke it. Another year would allow Two Rivers to restart this process with full input from all 30 member towns; a completed spatial analysis identifying the distribution of burdens and benefits as Vermont's Environmental Justice law requires; and a substantive revision of the plan's approach to agricultural and forest-based enterprise — one that supports it rather than restricts it. Act 181 and Act 250 both need reform. In the meantime, this plan needs to start over.

Vershire objects to this process in its entirety. A plan that designates 0.3% of a 30-town region for economic development, buries its parcel-level data, contradicts the town plans it has already approved, dismisses member town questions as *garbage* — Peter Gregory's own word describing my research on housing targets — and compresses the most consequential revision cycle into the least public window does

not meet the standard Vermont statute requires or Vermont communities deserve. The whole premise is wrong.

This plan needs to start over.

Respectfully submitted,

Michelle Massa

Chair, Vershire Planning Commission & newly appointed TRORC representative for Vershire

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Oral remarks as delivered at the July 29, 2026 public hearings are included in this document as Exhibit A.

July 29, 2026

APPENDIX — PUBLIC RESOURCE DOCUMENTS

The documents listed below were researched, written, and published by Michelle Massa, Chair of the Vershire Planning Commission, as a public service to Vershire residents and to the broader Two Rivers-Ottawaquechee region. They were produced because TRORC did not provide the plain-language explanations, comparative analysis, or landowner-accessible information that communities needed to meaningfully participate in the regional plan update process. These documents do not speak for the Vershire Planning Commission as a body; they represent the independent work of one volunteer commissioner who concluded that if this information was not going to come from TRORC, it had to come from somewhere.

All documents are publicly available and submitted here as supplemental context for the record.

- [Vershire TRORC Future Land Use Plan & Maps Analysis](#)
 - [Vershire FLU Map Explainer \(July 2026\)](#)
 - [Vershire PC Letter to TRORC \(July 2026\)](#)
 - [TRORC Regional Plan: Citizen's Petition Letter \(120 signatures\)](#)
 - [LURB / TRORC Meeting Executive Summary \(June 2026\)](#)
 - [Vermont's Regional Planning Commissions: Structure, Accountability, and Funding](#)
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EXHIBIT A — ORAL REMARKS AS DELIVERED

July 29-30, 2026 Public Hearings | TRORC 2026 Regional Plan

PART 2 — SPOKEN REMARKS

"Two Rivers-Ottawquechee's mission is to advocate for the needs of member towns, and to articulate a vision for building a thriving regional economy while enhancing the region's quality of life."

That is a direct quote from Two Rivers' own [2022 Strategic Plan](#). My first question is: whose definition of thriving? Because the rural Vermonters I represent define a *thriving economy* as being able to fix a neighbor's machinery, sell vegetables at a farmstand, bake bread for the community, host a farm dinner, or build an agritourism business — without spending years and thousands of dollars navigating Act 250. It's not that this plan falls short of that goal; it's that it does the exact opposite.

Act 181 — the statute this plan is required to implement — directs regional plans to *strengthen agriculture and forest industries, and to make land use decisions at the most local level possible*. The Land Use Review Board flagged [this](#) plan as non-conforming on both counts.

Let me share a few numbers with you.

0.3%. That is the share of land across 30 towns designated for commercial and industrial use — the newly named “Enterprise Area”. If you want to start a business, create jobs, or expand your tax base, that is what Two Rivers has left us.

- **2.4%**. that is the total growth-capable land in this entire region [per their interactive map](#) legend. And within that 2.4%, the Transition Area category is explicitly defined as land that 'doesn't qualify for growth due to lack of infrastructure.' So even that number is generous. If that doesn't sound like economic strangulation to you, I don't know what does.
 - *Downtown/Village Center: 1%*
 - *Village Area: 0.5%*
 - *Planned Growth Area: 0.3%*
 - *Transition Area: 0.3%*
 - *Enterprise Area: 0.3%*

2,424 to 3,640. That is the number of new housing units this plan claims the region can absorb by 2030 — concentrated in village centers that sit largely on floodplains with no water or sewer infrastructure. Their own senior planner called that “highly unlikely, but technically feasible.” That is not a housing plan; that is a disclaimer.

15. The number of policies in this plan restricting cell tower siting — in a plan that also commits to universal cell coverage for the region. You cannot have both.

33 days — that is the number of days in July that our town officials in Vershire were given to review a 210-page document, plus 7 other documents, and comment on a plan that reclassified our land without releasing parcel-level data on what's being reclassified and how; without the spatial analysis showing the benefits AND burdens, as required by Vermont's Environmental Justice law; and without a town-level public meeting in Vershire with THESE specific future land use maps (see [full timeline and analysis](#)).

Two Rivers approved our [Vershire Town Plan](#) in December 2025 — a plan that explicitly encourages small farm enterprises and a landowner's right to a reasonable economic return. The regional plan now contradicts it, without the explanation or mitigation that Vermont law requires.

This is not a vision for a thriving rural economy. This is a plan of contradictions and elitist mandates, written from a desk in Woodstock, applied to land its planners have never walked upon. And that is wrong. This entire plan should be scrapped.

Act 181 and Act 250 need serious reform. But more immediately — this plan needs to start over. S325 gives towns and regional commissions a one-year extension to do this work right. I am asking that TRORC seek a legal opinion on whether that provision applies here — because another year would allow Two Rivers to restart this process with genuine input from all 30 towns it serves: meaningful public participation, a proper spatial analysis that shows who bears the burdens and who gets the benefits as Vermont's Environmental Justice law requires, and a framework that openly supports farm and agriculture-based enterprises rather than restricting them. The whole premise of this plan is wrong. It needs to be rebuilt from the ground up.

My full written comments are submitted for the record tonight.