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Sent: Wednesday, July 29, 2026 3:05 PM
Subject: Supplemental Public Comment on the Draft TRORC Regional Plan

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Supplemental Public Comment on the Draft TRORC Regional Plan

Thank you for continuing to solicit public input as the Regional Plan evolves. My earlier comments focused primarily on the calibration of the draft's regulatory framework and the need to distinguish between the challenges facing Vermont's high-demand and low-demand regions. After attending one of the recent public meetings and reflecting further on the discussion, I would like to offer a broader observation that I believe sits at the heart of successful regional planning.

I believe the draft Plan seeks to preserve Vermont's landscape without giving equal attention to preserving the economic system and the rural communities that created that landscape in the first place.

Planning is not simply about preventing undesirable outcomes. It is about creating desirable ones.

Vermont's iconic landscape is not simply preserved. It has historically been, and still is, continuously produced by thousands of individual economic decisions made by farmers, foresters, landowners, tradespeople, small businesses, and rural communities over generations. Working landscapes are an economic achievement before they are a conservation achievement. Rural prosperity is not incidental to conservation; it is one of its preconditions.

That relationship deserves to be much more central to this Plan.

Throughout the public discussion, I heard extensive conversation about conserving forests, protecting natural resources, implementing Act 181, and managing future development. I heard much less discussion of how TRORC intends to sustain the communities that have produced the very landscape we are trying to conserve.

That raises what I believe is a fundamental planning question:

What is TRORC's theory of rural prosperity, and what is TRORC doing as an institution to promote it?

How does this Plan make it more likely that a young family will choose to farm here, start a business here, manage a working forest here, renovate an old farmhouse here, raise children here, and ultimately choose to stay here? How does it help existing residents continue investing in their land and communities? And how does it expand opportunity in the lower-demand rural areas where economic and demographic decline (not excessive growth) is the dominant risk?

Planning is not simply about managing the possibility of negative change. It should help create a positive future.

Across much of the TRORC region, the greatest long-term threat to Vermont's landscape is not runaway development. It is the gradual disappearance of the economic opportunities, working lands, and social and civic systems that have sustained that landscape for generations. Empty farms, closed businesses, shrinking schools, aging populations, and the loss of younger families will ultimately reshape the landscape every bit as surely and adversely as poorly planned development. In most of rural Vermont, the former risks are significantly greater than the latter.

The working landscape that attracts visitors from around the world is not an accident of geography. It is the product of a functioning rural economy. Visitors come to experience active farms, managed forests, open fields, village centers, country stores, sugarhouses, and the communities around them. Those places exist not because they

were frozen in time, but because generations of Vermonters found ways to build them while making a living stewarding the land.

The viewsheds that people come to visit require the cows, but the cows also require the farmer, the veterinarian, the equipment dealer, the feed supplier, the processor, the mechanic, the local businesses, the school and its teachers, and, ultimately, a community in which the next generation can realistically imagine building a life of its own.

A working landscape worthy of protection is the product of a working economy.

This is not merely an argument for balancing conservation against some unrelated economic interest. It is a charge fully embedded in the Legislature's mandate to Regional Planning Commissions. Under 24 V.S.A. § 4347, a regional plan is intended to guide the "coordinated, efficient, equitable, and economic development" of the region and promote the "prosperity and welfare of current and future inhabitants." Section 4345a directs Regional Planning Commissions to facilitate economic development programs for the appropriate development, improvement, protection, and preservation of the region's physical and human resources.

The statewide planning goals with which regional plans must be consistent are equally clear. Section 4302 calls for a strong and diverse economy, rewarding job opportunities, expanded economic opportunity in areas with high unemployment or low per-capita incomes, and the encouragement and strengthening of agricultural and forest industries. The statutory framework does not treat prosperity and conservation as opposing responsibilities. It demands that regional planning pursue them together.

I respectfully suggest that the draft Plan should more fully embrace that entire mandate and that its commitment to equity should expressly include **geographic equity**.

Equity should not mean applying identical policies to fundamentally different places. It should mean recognizing that communities facing fundamentally different circumstances deserve policies calibrated to those realities.

A regulatory framework designed to address intense development pressure in Stowe, Chittenden County, or other high-demand areas may be entirely appropriate there. Applying the same assumptions and burdens to communities whose principal challenges are economic stagnation, population decline, aging demographics, shrinking schools, and disinvestment is not geographic equity. It is geographic uniformity, and it risks accelerating the very hollowing-out that threatens these communities today.

Vermont is not one planning problem. Different regions face different dominant risks,

and good planning should respond to the risks actually present rather than applying identical solutions everywhere.

This does not require abandoning conservation goals or weakening environmental protections. It requires calibrating policy to the realities of different parts of Vermont, placing equal emphasis on creating rural opportunity, and evaluating every recommendation by whether it strengthens or weakens the communities that make long-term conservation possible.

That is particularly important because the cumulative effect of mandatory requirements, procedural complexity, and regulatory uncertainty can be substantial even when no single provision appears unreasonable in isolation. Each additional layer makes it incrementally harder for someone to renovate an old property, create modest housing, monetize or expand a farm, open a small business, manage a working forest, or make the individual investment that keeps land and buildings in productive use.

Those individual decisions accumulate over time, just as conservation successes do.

Every major recommendation in this Plan should therefore be evaluated against a simple question:

Will this recommendation make it more likely that people can continue living, working, investing, farming, managing forests, operating businesses, and raising families in every part of the TRORC region—including its lower-demand rural communities?

If the answer is no (or even "probably not"), then the recommendation deserves another look, because its long-term result may be fewer working landscapes rather than more.

Conservation and economic vitality are often presented as competing objectives. In much of rural Vermont, they are deeply interdependent. Agriculture and tourism—two of the industries most closely associated with Vermont's identity and landscape—both depend on economically viable working lands and living rural communities.

A landscape emptied of the people who created and maintained it is not a working landscape at all. Embedding it in amber is not preservation. At best, it creates a museum exhibit; at worst, it creates the conditions for the landscape's eventual loss as the economic and social systems required to maintain it disappear.

The Legislature did not charge Regional Planning Commissions with preserving scenery alone. It charged them with promoting equitable and economic development, facilitating economic opportunity, advancing the prosperity of current and future inhabitants,

strengthening agriculture and forestry, and protecting the region's physical and human resources.

I respectfully suggest that the draft Plan would be strengthened by more clearly articulating how it intends to fulfill all of those responsibilities together.

The central question facing this Regional Plan is not simply how to conserve Vermont's landscape. It is how to conserve it with geographic equity—by adopting policies that recognize the very different realities facing different parts of our region and by preserving the economic opportunity and rural communities without which the landscape cannot endure.

In much of rural Vermont, the most important conservation strategy may simply be ensuring that people still have a realistic opportunity to build a life there.

Respectfully submitted,

Tom Reed

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