

From: [Act250 - General](#)
To: [Jay Kullman](#)
Cc: alisha.carberry@gmail.com; [Act250 - General](#); regionalplan@trorc.org; [Act250 - Board](#)
Subject: RE: Comments and preserving standing with LURB (forwarding message)
Date: Wednesday, August 5, 2026 8:16:37 AM
Attachments: [image001.png](#)

Good morning, Jay,

Thank you for your message. By CC of this email, I'm routing your comments and request to the Board mailbox for their review.
For any future correspondence or direct replies, you're welcome to email the Board directly at act250.board@vermont.gov.

Kind regards,
Alex

Alexandra Pastor, MPA | Information Management and Records Officer
Land Use Review Board
10 Baldwin Street
Montpelier, VT 05633-3201
802-828-5449
<https://act250.vermont.gov>

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From: Jay Kullman <Jay@farmandwilderness.org>
Sent: Tuesday, August 4, 2026 7:37 PM
To: Act250 - General <Act250.General@vermont.gov>; regionalplan@trorc.org
Cc: alisha.carberry@gmail.com
Subject: Comments and preserving standing with LURB

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Good Day,

I represent the Ninevah Foundation and Farm & Wilderness Foundation as Executive Director. Together, our organizations own and manage more than 5,000 acres of land, primarily in the Towns of Plymouth and Mount Holly.

I am writing to request information regarding the designation of our properties in Plymouth under the draft TRORC Regional Plan and any proposed Tier classifications

under Act 181. Specifically, I would appreciate clarification regarding how these designations may affect future land use opportunities, Act 250 jurisdiction, and the property rights associated with our lands. I would also like to understand the process by which we may formally participate in the review and comment process.

As you may know, we currently operate longstanding summer camp programs on these lands. Like many nonprofit and recreational landowners, we face an increasingly challenging operating environment and are concerned about maintaining the flexibility necessary to sustain our organizations into the future. We share concerns similar to those expressed by Todd Heyman of Vershire regarding the potential long-term impacts of these planning designations on private landowners, farms, and mission-driven organizations.

In addition, approximately 3,800 acres of our holdings have been permanently conserved through conservation easements under the Federal Forest Legacy Program. Given these existing conservation commitments, we would appreciate understanding how they were considered during development of the proposed Regional Plan and Future Land Use Map.

I also note that portions of our property appear to be classified as **Resource-Based Recreation Areas**. The draft plan states that only four areas in the region are large enough to merit this Future Land Use designation: Sackadana Six, Lake Morey, Lake Fairlee, Quechee Lakes. Given this language, I would appreciate clarification regarding why our property has been assigned this designation and whether TRORC considers our lands to constitute an additional Resource-Based Recreation Area. If so, I would like to understand the basis for that determination and the implications of this classification.

More broadly, I share concerns expressed by other landowners that TRORC may have exceeded its statutory authority in developing certain portions of this plan.

Thank you for your time and consideration. I look forward to your response and to continuing a constructive dialogue regarding these important issues.

Sincerely,

Jay Kullman

Jay Kullman (he/him)



Executive Director
Farm & Wilderness and Farm & Wilderness
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www.farmandwilderness.org

Learn more about our work: [Decoding the
Magic of Camp](#)