

From: [Shawna Pierson](#)
To: regionalplan@trorc.org; [Act250 - Board](#)
Subject: TRORC plan comment
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To the Two Rivers-Ottawquechee Regional Commission and the Land Use Review Board:

Re: First Hearing Draft — 2026 TRORC Regional Plan

I am a landowner in the Town of Corinth, Vermont, and I am submitting these comments on the First Hearing Draft of the 2026 TRORC Regional Plan. I appreciate the opportunity to participate in this process and ask that my comments be considered in full before the Plan is finalized.

****1. The Prohibition on Fossil Fuel as a Primary Heating Source Creates an Undue Financial Burden on Builders and Housing Affordability (Chapter 10, Page 10-16, Policy 2)****

I have serious concerns about Policy 2 under the Thermal Energy section, which states that new residential developments subject to Act 250 shall not use fossil fuel combustion as a primary heating source.

My husband is a licensed Plumbing and HVAC contractor with years of hands-on experience in Vermont. He is regularly called to service cold climate heat pump installations that are failing to adequately heat homes during our harshest winter conditions. In numerous instances, he has been required to install a secondary backup heating system after the fact — at significant additional expense to the homeowner — because the heat pump alone could not meet the building's heating load during extreme cold events.

The Plan itself acknowledges on page 10-8 that "air-source heat pumps may be inadequate to meet a building's heating load during extreme sub-zero days" and that "secondary heating systems may still be required." This is not a hypothetical — it is the lived experience of Vermont contractors and homeowners. If primary electric heat via heat pump is effectively inadequate as a standalone system in Vermont's climate, then mandating it as the only permitted primary source will, in practice, require builders and buyers to install and pay for two complete heating systems. That doubles the heating infrastructure cost of every new home subject to this policy.

The practical result is that housing construction costs increase, which makes homes and rental units more expensive for Vermont residents. This directly contradicts the state's stated goals of expanding housing availability and reversing population decline. Vermont is already experiencing a housing affordability crisis and a declining workforce population. Policies that increase construction costs work against both of those problems simultaneously.

I urge TRORC to revise this policy to allow for high-efficiency fossil fuel systems, wood pellet boilers, or other renewable thermal sources as permissible primary heating options, and to avoid mandating a single technology that the market and the climate have not yet fully validated for Vermont's conditions. We do not even know how much our grid can support.

****2. Vermonters Have Earned the Right to Be Trusted as Stewards of Their Own Land****

This Plan proceeds from an implicit assumption that without regional oversight and mapped restrictions, Vermonters will mismanage or overdevelop their land. The evidence does not support that assumption. Vermont's rural landscape — its forests, fields, clean water, and scenic character — remains one of the most intact and beautiful in the northeastern United States. That is not an accident. It is the direct result of generations of Vermont landowners who have cared for their property, managed their forests responsibly, and made thoughtful decisions about what to build and where.

Vermont's appeal to residents, visitors, and new arrivals alike is a testament to what private stewardship has already achieved. Landowners do not need to be told by a regional plan to protect their land — they have been doing it, without mandates, for generations. The Plan should acknowledge this record and reflect a posture of partnership with landowners rather than one of suspicion or preemptive restriction. Vermonters can and should be trusted to continue stewarding their land responsibly.

****3. The Future Land Use Maps Contain Material Errors and Were Not Created with Parcel-Level Accuracy****

I am deeply concerned about the accuracy of the Future Land Use Area maps underlying this Plan. It appears that parcels have been assigned designations — including forest-based or conservation-oriented categories — based on remote sensing data or landscape-level analysis rather than actual parcel history or owner knowledge. The result is that landowners who have simply chosen not to clear-cut their property may now find their land designated as a forest resource area, with all the accompanying development restrictions that entails.

This is not a minor technical issue. A landowner who has responsibly maintained mature trees on their property — as good stewards do — should not be penalized for that choice by having their land reclassified in a way that limits what they can do with it. The decision to keep trees standing should never result in a more restrictive land use designation than would apply if the trees had been removed.

Furthermore, maps created at the regional scale using satellite imagery or statewide datasets are inherently unable to capture the individual history, use, and character of private parcels. Many of the designations in this Plan appear to be flat-out wrong when compared against what landowners actually know about their own property. Before this Plan is adopted, TRORC should be required to provide a parcel-level notification and correction process that allows individual landowners to review the designation applied to their land, present evidence of its actual history and use, and request a correction. Adopting a plan with known mapping errors and then allowing those errors to influence Act 250 proceedings or local zoning would be deeply unjust to the affected landowners.

****4. Landowners Are Not Being Adequately Notified That Their Properties May Be Affected by New Designations****

The 2026 Plan introduces new Future Land Use Area designations under Act 181, renames existing categories, and — in some cases — changes the policies that apply to specific parcels and land types. These changes have real implications for what landowners may do with their property, including density limits, permitted uses, and how their land would be treated in any future Act 250 proceeding.

Despite the significance of these changes, there is no requirement — as far as I am aware — that individual landowners be notified in writing that their specific parcel is being redesignated, or that the policies governing their land are changing. The current outreach process relies on public hearings, newspaper notices, and online postings. This is wholly insufficient to reach the substantial portion of Vermont's population — particularly our large and growing retired community — who are not regular internet users, do not read legal notices in newspapers, and have no reason to know this process is underway.

Many of my neighbors have no idea this Plan exists, let alone that it may affect what they can do with land they have owned and paid taxes on for decades. If a landowner does not participate in this public comment process, they may find themselves with substantially reduced development options on their property — and with limited legal recourse, given that active participation during the planning process is often a prerequisite to challenging a plan's application later.

I respectfully request that TRORC and the LURB require direct written notice — by first-class mail — to every landowner whose parcel falls within a Future Land Use Area where new or changed restrictions are being proposed. That notice should clearly explain: (1) what the current designation is, (2) what the proposed new designation is, (3) what specific changes in permitted uses or density that change represents, and (4) exactly how and by when to submit a comment. This is not an unreasonable burden. Property records are public, mailing addresses are available, and the stakes for individual landowners are significant.

****5. The Plan Should Not Dictate Where on a Private Parcel an Owner May Locate a Structure****

I understand that environmental law independently governs building in floodplains, river corridors, and wetlands, and I have no objection to those protections. However, the Plan's policies on forest block preservation, wildlife connectivity, and scenic resources — while framed as guidance — create a framework that, if adopted into local zoning or applied in Act 250 proceedings, would effectively tell a private landowner where on their own property they may or may not site a home.

Vermont landowners already pay some of the highest property taxes in the region. Many rural landowners, including myself, own land that is being quietly treated as a conservation asset for the benefit of the broader public — without compensation. If the state or region wishes to restrict development on private land for conservation, scenic, or wildlife purposes beyond what existing environmental law already requires, then there must be a corresponding mechanism to compensate landowners for the lost value and utility of their property, or to provide meaningful property tax relief on land they are effectively precluded from developing.

A plan that says "you may not develop this portion of your land" while simultaneously requiring you to continue paying full property taxes on it is not equitable. I urge TRORC to either limit its site-level development guidance to areas already covered by enforceable state environmental law, or to explicitly recommend that the State create a property tax credit or compensation mechanism for landowners whose development options are materially restricted by regional planning designations.

****Conclusion****

I support thoughtful regional planning and I understand the goals this Plan is trying to achieve.

My concerns are not with planning itself, but with policies that impose real financial costs on individual Vermonters without adequate notice, without compensation, and in some cases without sufficient evidence that the mandated approach will work in our climate. Vermont's landscape is beautiful precisely because Vermonters have taken care of it. A regional plan that treats landowners as obstacles rather than partners — and that is built on maps that do not accurately reflect the reality on the ground — will not earn the trust or cooperation it needs to succeed.

I ask that TRORC treat these comments seriously and reflect them in revisions to the hearing draft.

Thank you for the opportunity to be heard.

Respectfully,

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