

Cover Sheet

	VERMONT
LAND USE REVIEW BOARD	
Application #: RPC10-0001	
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TO: Kyle Katz, Two Rivers Ottauquechee Regional Commission

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Land Use Review Board, Act250.Board@vermont.gov

FROM: Town of Newbury Selectboard; Susan Culp (Chair), Shauna Prime, Andrew Lee

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As an addition to the record, please find attached the oral testimony provided on behalf of the Town of Newbury Selectboard at the July 30, 2026 TRORC Regional Plan hearing in White River Junction.

Thank you for your consideration of this input.

Testimony TRORC Hearing on 2026 Regional Plan Draft

Thank you for the opportunity to speak. My name is Susan Culp. I am the Chair of the Town of Newbury Selectboard.

I am here to share the concerns we have with the 2026 regional plan as it is currently drafted. We have collectively approved our commentary at our Selectboard meeting last night – and you will receive our written feedback on the plan by the August 10th deadline that has been established.

However, we felt it was important for the Selectboard to go on record in this hearing as well.

First off, I do want to acknowledge the amount of work that goes into creation of a plan of this scale – while I am here to share concerns about what is actually in it – I do want to recognize what a huge task it is to pull it all together.

Now to the less welcome, though I'm sure not surprising, remarks. There are three main areas of concern that Newbury has about the current plan.

The first and the most troubling to us is substantive: in the extensive reliance throughout the plan on prescriptive language, that in many cases steps well beyond the bounds of regional planning authority and seems to usurp municipal land use planning and zoning authorities. This is a 210 page document, so listing out those particular points would take longer than we have in this hearing, but they will be catalogued in our written comments.

Suffice to say, the Town of Newbury will not support a plan that incorporates this language, which appears on its face to be an attempt to exert a kind of “super zoning” power that can override local government decision making. Furthermore, some of these prescriptive provisions are present in goals and planning recommendations where no reasonable regional nexus even exists – so the basis for an RPC to assert this authority is wholly outside the realm of what is appropriate based on the plain language of Title 24. Technical assistance and advice are welcome services of an RPC. Overriding local zoning and land use decisions are absolutely not.

Our second concern centers on the member community and general public participation process itself. While Two Rivers may be adhering to the strictest

interpretation of the letter of the law in this, as far as encouraging meaningful engagement and input, it has been sorely lacking.

I read the regional plan outreach summary posted on your website – and superficially, it appears impressive... however, I would emphasize that the approach taken has been reliant on the strategic release of tiny slices of details, incomplete information, dribs and drabs of mapping, occasional trial-balloon language.... Altogether, a totally piecemeal and disjointed approach that has clouded the public's – and member community's – understanding of the entirety of the changes, the collective weight and impact of what's in this 210-page document on communities and on people whose lives will be affected. This comprehensive document, where everyone was able to finally see all the pieces pulled together was not shared with communities until the end of June. Then there was only one short month – during, frankly, one of the busiest times of the year – to digest this and provide meaningful input.

I'm not sure why Two Rivers chose this approach, but it has been totally inadequate to support real and informed participation in this process. It does not give our community confidence in Two Rivers when it comes to transparency, accountability or that the best interests of our town is being served here.

And the last thing I'd like to comment on are the housing targets that are now memorialized in this plan – along with, I understand, the expectation that these targets will be embedded into planning at the local level.

Targets are fine – they can be a useful aspirational tool.

But, I would like to again emphasize that these targets are completely untethered from reality – and despite any community's best efforts at meeting them, (as you know – you note it in this plan!) the construction of new housing units at scale is largely outside of the control of local, regional or even state government. We can't compel private landowners to make their property available for development. We can't force developers to come in and build projects if they don't pencil.

The Town of Newbury has already made its zoning bylaws as conducive as possible – without losing sight of all of the other fine planning goals – like steering growth away from floodplains, supporting local agriculture, quality of life, historical resources, etc. etc. To place such targets in a plan, with the possibility lurking out there of punitive measures for municipalities if they are not met, is simply unworkable.

In closing – we request that Two Rivers:

- 1) Remove prescriptive language in the plan and revise it to provide regional scale guidance as appropriate for an RPC; and
- 2) Remove the language that asserts RPC jurisdiction or influence in matters where there is no reasonable regional impact or nexus; and
- 3) Drop the language where municipalities **must** meet objectively unrealistic housing targets.

Without these changes, the Town of Newbury will strongly oppose the adoption of the 2026 Regional Plan.

Thank you for the chance to speak. And we'll be sending in our detailed comments.