

From: [Hurley, Janet](#)
To: [Michelle Massa](#); [Hadd, Sarah](#); [Weinhagen, Alex](#); [Dingledine, Brooke](#); [Sultan, Kirsten](#); [Act250 - Board](#)
Subject: Re: Formal Comment: TRORC 2026 Regional Plan — Methodology Deviations, Statutory Incompatibility, and LURB's Pre-Adoption Obligations
Date: Thursday, August 13, 2026 11:04:01 AM

Hello Michelle.

Thank you for this communication on the TRORC draft plan.

I have reviewed your summary of the Board's preapplication response. I do want to correct one aspect of your summary.

In your summary you specifically say that the Board's preapplication response indicated that TRORC interpreted the compatibility element requirement differently than other RPCs. That is an incorrect reading of our response. What we said was:

- Most RPCs interpret § 4348a(a)(8) to mean that their plans need to be compatible with the plans of their member municipalities (see page 11-5), rather than to those of adjacent municipalities. This approach is reflective of the 4345a(5) requirement that RPCs prepare regional plans that are "compatible with approved municipal plans" (Page 22 of the Board's preapplication response.)

In this interpretation of the compatibility element, TRORC is in line with other RPCs by commenting on compatibility with the plans of its member municipalities, not just the plans of adjacent municipalities.

However, the Board assessed that the TRORC must provide additional information on this matter:

- Given extensive comments from municipalities and the public expressing concerns about the draft TRORC plan and its relationship to municipal plans, provide more evidence that the draft regional plan is compatible with adopted municipal plans within and adjacent to the region. (Page 22 of the Board's preapplication response)

Your questions about expiration of designation benefits should be directed to ACCD/DHCD officials. The Board is not the authority on the Community Investment Program benefits and their administration.

Best, Janet

Janet Hurley | Board Chair
Land Use Review Board
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Subject: Re: Formal Comment: TRORC 2026 Regional Plan — Methodology Deviations, Statutory Incompatibility, and LURB's Pre-Adoption Obligations

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Dear members of the Land Use Review Board and relevant parties,

I'm following up on my formal comment from Aug. 6. The comment period has closed, and many in the community are asking what's next.

I just came off TRORC's Executive Committee meeting, listening for any insight or self-reflection on this process. There was none; just a brief, two-minute mention of the Regional Plan in passing. Next steps, as I understand them:

- The full comments log is available [HERE](#).

- At/by month's end, a revised draft plan goes to the public and the Commission.
- A vote is scheduled at the Sept. 9 TRORC Board meeting.

That's a very compressed timeline, again, for the whole community to review what we hope will be a meaningfully revised document.

Request for LURB review:

To help distill a large volume of dense material, I put together an [analysis of the LURB's preapplication review](#) with a goal of summarizing and explaining what's in your Review. I'd ask that the LURB review it, confirm I got this right, and offer guidance where I didn't. I realize this request may not be typical, but then again, neither is the process TRORC has run here. I'm not an attorney, and I'd really appreciate your group's eyes on it before time gets away from us in this process.

My own view, separately:

I believe TRORC's full Executive Committee should also see this analysis, so it can factor into LURB's plan-adoption requirements and into whether this plan reflects community will. As written, I don't believe it has broad support:

- 158+ formal comments in the Responsiveness Log, including [ONE PETITION LETTER](#) signed by 120 individuals in the community.
- A comment from the [VT Dept. of Housing and Community Development](#), noting TRORC *"is substantially lagging in residential unit production toward their housing targets. The current rate of production puts the region far behind the pace for their upper 2030 housing targets... a substantial gap remains between the area's production and its ideal production to achieve a robust and healthy housing market."*

In my view, the restrictive zoning and policy layers TRORC has proposed will function as economic strangulation for our rural communities — the opposite of what the Legislature intended with this law.

Three clarifications for the community:

- Unexpired designations: Benefits are protected through July 1, 2034, but only for "unexpired" designations. If a designation expires Dec. 31 for lack of approval, is it still covered? Unclear.
- Act 152 (S.325) extension: This extends deadlines for plans "due to expire" in 2026 or 2027. TRORC's plan doesn't expire on its own until 2033 — does the extension apply to TRORC's Dec. 31, 2026 deadline at all? Has a legal opinion been sought on this matter, as requested of TRORC?
- Cure period asymmetry: If TRORC submits and is rejected, it gets an 18-month cure period under § 4348(l), with no harm to towns. If TRORC doesn't submit at all, that

grace period may not apply — meaning a rejected submission could be the better outcome for towns than no submission. Is this a correct reading? Please clarify.

Thank you for considering this request and clarifying on these points.

Michelle Massa

Vershire

From: Michelle Massa <shellfro@hotmail.com>

Sent: Thursday, August 6, 2026 4:30 PM

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Subject: Formal Comment: TRORC 2026 Regional Plan — Methodology Deviations, Statutory Incompatibility, and LURB's Pre-Adoption Obligations

Dear Members of the Land Use Review Board,

Attached is my latest formal written comment on the TRORC 2026 Draft Regional Plan. I'll be direct about something: I wish I didn't have to send it; there are ripe blueberries going *unpicked*, and that's a tragedy.

However, these concerns are real, and they're documented in detail. Sadly, the sheer volume of material that citizens, planning commissioners, and selectboard members across this region have had to produce just to *ATTEMPT* to be heard is itself evidence of a broken process and organization defined by arrogance and unprofessionalism. Over the past several weeks and months, towns including Vershire, Pomfret, Brookfield, Topsham, Newbury, Bethel, Randolph, Strafford, Bradford, and others have submitted letters, attended hearings, filed comments, and shown up — repeatedly — to ask basic questions that should have been answered way

before a single boundary was drawn. Each time, we asked questions and we got platitudes, deflection, and non-answers. Not one of us left any of those info sessions or hearings feeling heard or satisfied with the responses. These meetings were a farse. Please, watch the replays, starting with [Bethel](#).

We are not a group of squeaky rural complainers who don't understand how regional planning works. We are elected and appointed municipal officials, landowners, farmers, business owners, and neighbors who have read the methodology and plan, looked at maps, checked it against the statewide guidance, and found that it doesn't hold up. It is a trainwreck. The formal comment attached documents four specific deviations between TRORC's July 2026 FLU mapping methodology and the VAPDA standards TRORC's own document acknowledges as controlling. It raises a statutory compatibility question that has not been answered, and it asks (begs?) the LURB to do what it was created to do: **hold the line on process before any vote, not after.**

This is the ask:

1. Stop the clock now. Time out.
2. Require TRORC to answer with specificity and integrity these questions as presented by me, Neil Ryan, Todd Heyman, John Moore, Gwynn Zakov (Brookfield Planning Commission, former VLCT), and many others.
3. Then proceed with a public process that is inclusive, legitimate, and iterative, just as other RPCs have done over the past 12 months.

The attached comment explains the legal basis for that ask in full. I am not an attorney, but I am doing the best I can with the skills I have available to me. I'm available to discuss any of it directly.

Respectfully,

Michelle Massa
Chair, Vershire Planning Commission
TRORC Board Representative, Town of Vershire
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