

TRORC: A Regional Planning Commission Out of Control

Legislative Briefing, prepared for the Governor's Office; Lieutenant Governor John Rodgers; Rep. Rob North, member of the Legislative Oversight Committee established under S.325; Rep. Michael "Mike" Tagliavia (Orange-1); and Sen. John Benson (Orange District) — in advance of the October 8 meeting.

Prepared by: Michelle Massa, Chair, Vershire Planning Commission; Vershire's TRORC Board Representative, with documentation from fellow Commissioners and members of the public across TRORC's 30 member towns. Many resources are listed at the end of this report for validation and further reading.

1. In a Nutshell

The Two Rivers-Ottawaquechee Regional Commission (TRORC) writes land-use rules with the force of law for 30 Vermont towns. By state law, TRORC is governed by 30 town-appointed Commissioners, ordinary Vermonters who serve at the pleasure of their own Selectboards. In practice, two long-tenured staff members, Executive Director Peter Gregory and Senior Planner Kevin Geiger, run the organization with effectively no oversight or accountability. They have blocked public participation, censored communication between Commissioners, threatened towns with the loss of grant funding, and used their positions to push personal agendas in Act 250 permitting fights, sometimes making claims that were later proven false (e.g. [Peace Field Farm, Woodstock example](#)).

The TRORC Executive Committee, VLCT, LURB, and the Vermont Attorney General's office have all been asked to intervene, but nothing at TRORC has changed. It just got worse, in fact. The Attorney General's office took a meeting on this matter in September and a follow-up is scheduled; that inquiry is open and no determination has been made as of this 9/17/26 report.

This is not a new problem. The behavior documented below did not begin after S.325 passed; it was already ongoing while S.325 was being debated last session, and it has continued, unchanged, ever since. My understanding is that the Legislative Oversight Committee was created with the Land Use Review Board principally in mind rather than the regional commissions. The Committee exists nonetheless, and the regional commissions sit squarely inside the land use system it was built to watch, and no other body is currently positioned to examine what follows. The October 8 meeting is the first real opportunity to put it before the Committee in one place. In my view what this record describes is a systemic breach of the public trust. We are begging for help in this matter.

This aggregation of grievances is not one town's grievance, but more than thirty separate documented incidents, drawn from seven towns across TRORC's wide region, spanning 2021 through September 2026. There is much more, but at some point I had to hit send. So here it is.

Nine Documented Patterns

What this briefing covers, and where the record sits

01

Coercion Over Funding

TRORC staff used grant funding and permitting authority as leverage against member towns and individual landowners.

Section 2

02

Excluding the Public

TRORC excluded the public from a March 2026 meeting, then admitted the Open Meeting Law violation only under threat of legal action.

Section 3

03

Excluding Commissioners

In September 2026 three sitting Commissioners were barred from a closed session. A commissioner contact list was withheld 17 days.

Section 3

04

Abusive Conduct by the Director

Executive Director Peter Gregory swore at a member of the public and did not deny it. TRORC's own policy required the Executive Committee to act. It did not.

Section 4

05

Conduct in Act 250 Cases

In the Peace Field Farm case TRORC staff are alleged to have made false claims to regulators, entered private land without consent, and taken positions no Commissioner approved.

Section 5

06

No Discipline Mechanism

Neither TRORC's bylaws nor its Code of Conduct can discipline staff, and regional commissions sit outside Vermont's Municipal Code of Ethics.

Section 6

07

Town Requests Unanswered

Towns asked TRORC which parcels are being reclassified, for per-town land use figures, and for the environmental justice analysis LURB required. None were supplied.

Section 6

08

The Plan Language Binds

The Vermont Supreme Court held in *In re B&M Realty* (2016) that TRORC's mandatory plan language is enforceable against landowners in Act 250.

Section 7

09

Defying State Oversight

Asked by the state Land Use Review Board to justify its mandatory policies, TRORC's written answer disputes the Board's authority to ask.

Section 8

Every item is backed by a written record, available on request.

2. Overreach and Coercion

Staff have repeatedly used their control over grant funding and permitting authority as leverage, both against towns and against individual landowners, rather than serving as neutral technical advisors.

- "I don't care... I'm here to get this regional plan through." Said by Executive Director Peter Gregory at a public Executive Committee meeting on April 8, 2026, in direct response to a request that the Board reopen public comment on part of the plan. The quote is confirmed by two independent sources, including TRORC's own official response document.
- A Bradford business owner reported that at a Selectboard meeting, Gregory told the town it could "talk about it until the cows come home," widely understood by those present as a signal that continued objections would put the town's grant funding at risk.
- At a public hearing, Senior Planner Kevin Geiger stated that grant funding could be revoked if the town did not adopt the plan as written, a comment one Commissioner who was present described as fear-mongering.
- When Vershire's Planning Commission asked for help updating its town bylaws, staff first said a grant deadline had already passed, then offered free help, then reversed course and demanded a paid contract once Vershire's own analysis got too detailed for staff's liking.

3. Silencing the Public and the Board

State law requires regional commissions to give the public a meaningful chance to weigh in, not just a formality. TRORC has repeatedly closed that door, on both the public and its own governing Commissioners.

- **March 25, 2026:** Gregory excluded the public from a meeting in violation of Vermont's Open Meeting Law. TRORC denied any wrongdoing until threatened with legal action, then, following a written Open Meeting Law notice from Corinth farmer Neil Ryan on August 10, 2026, admitted the violation at an August 20 special meeting. Several community members doubt that the cure was done properly as the Commission defied its own legal counsel's advice on the remedy.
- A citizen who was speaking during public comment was cut off and muted mid-sentence after criticizing a staff-written policy, even as other attendees offered to give him their own time to finish.
- Staff blocked the Board Chair's own outgoing letter from referencing a Commissioner's written analysis of an official state review, evidence that an Executive Director overruled his own Board Chair's communications.
- The delay is selective, not universal, which is the point. On January 13, 2025, a male Commissioner objecting to the draft regional plan asked staff for the full commissioner contact list and had it the next day. On August 14, 2026, I asked for the same list to circulate my own summary of LURB's official review, a document LURB's own Chair, Janet Hurley, had already reviewed. I received no response, asked again in person at the August 20 meeting, asked a third time in writing on August 31, and finally received the list that same day, seventeen days and three requests later. There is no established channel for Board communications; all staff emails get sent out to Board members as BCC (not visible).
- **September 9, 2026:** TRORC cancelled the public meeting scheduled for that day, at which residents were to ask questions about the Commission's written responses to public comment, on the stated grounds of giving everyone more time to digest the material. No replacement meeting dedicated to that purpose has been scheduled. The next opportunity is the limited public comment period on the agenda of a regular Board meeting on September 30, not a dedicated session. For a 294-page responsiveness document affecting thirty towns, a comment slot on a board agenda is not a substitute for a meeting designed for meaningful public participation.

- **September 14, 2026:** TRORC's Executive Committee held a same-week "emergency" meeting with no topic listed on the agenda, muted a Commissioner during public comment, and denied three sitting Commissioners access to a closed executive session, while admitting *on the record* that the Committee itself had one more member than its own rules allow.
- **September 15, 2026:** Neil Ryan, a farmer from Corinth, filed his second formal Notice of Alleged Open Meeting Law Violation and Request for Cure under 1 V.S.A. § 314(b)(1), addressed to Chairman Bill Emmons and copied to Peter Gregory and the Office of the Vermont Attorney General. It alleges eight separate violations arising from the September 14 meeting, including an agenda that never stated the nature of the proposed executive session, a special meeting never publicly announced as § 310(7) requires, a motion that identified no business at all, the exclusion of sitting Commissioners from a closed session with no motion or vote on their exclusion, and formal action taken *behind closed doors*. Under § 314(b)(2) TRORC has ten calendar days to respond publicly. Under § 314(b)(3), silence is treated as a denial. That response is due on or about September 25, before this Committee meets.

4. Unprofessional and Abusive Conduct

- **September 9, 2026:** Gregory told a member of the public “fuck you” (twice) and “fuck off”, at a public coffee shop, after being asked a pointed, but non-abusive question, about the public meeting cancelled that same day. When the Board Chair raised it directly with him, Gregory did not deny saying it; he said only that he had felt *threatened*, as he walked over to browse the pastry selection.
- TRORC's Abuse Policy, adopted by its Executive Committee on January 12, 2022, is written to protect staff. It addresses abuse directed at staff by "clients, contractors, other staff, or the public," and it names the Executive Director as the person empowered to enforce it. It offers the public no protection at all, and that gap is itself worth the Legislature's attention.
- The policy does, however, contain one provision that applies here: "Verbal abuse by supervisory staff or Board members shall be reported to the Commission's Executive Committee for action." Peter Gregory is supervisory staff. On its own terms, this policy required TRORC's Executive Committee to act on his September 9 conduct. The Executive Committee met on September 14, yet it took no action on his conduct. They simply said they will have their attorney draft a statement for “damage control”. No mention of disciplinary action.
- In 2023, while a permit case was pending, Gregory and Geiger visited a restaurant owned by the applicant and made disparaging remarks about him and his farm to restaurant staff and other customers. When confronted, Gregory did not deny the incident, describing it as “having a few drinks and shooting their mouths off.”

5. A Specific Case Study: The Peace Field Farm Permitting Fight

The Peace Field Farm (Peacefield LLC) Act 250 case in Woodstock/Pomfret is real and independently documented: Valley News, the Vermont Standard, Mountain Times, and VTDigger covered it from 2021 until the final appeal was dismissed with prejudice on April 23, 2026, when the restaurant was found to qualify as an Accessory-on-Farm-Business exempt from Act 250. A November 2022 VTDigger article on a separate Woodstock zoning dispute quotes Geiger by name and title as TRORC's director of planning, speaking on Woodstock zoning enforcement, and references the Peace Field restaurant as a related permitting matter. That establishes Geiger spoke publicly on Woodstock zoning, but it does not by itself confirm his role in the Peace Field case. The specific allegations below come from a draft complaint prepared by Todd Heyman, owner of Fat Sheep Farm in Hartland and a former attorney; Michelle Massa has requested the underlying documentation from him directly

and it is pending as of this writing. They are included here as serious, specific claims warranting the Committee's attention, but not as independently confirmed fact.

- **Per Heyman's account:** Geiger's official letters to state permitting regulators in 2021 contained specific factual claims about the applicant's farm activities that were demonstrably false, and were never corrected even after being disproven. (Documentation requested, not yet independently verified.)
- **Per Heyman's account:** Geiger and Gregory entered the applicant's private land to investigate the property without ever asking permission, a violation of state law that requires a regional commission to obtain consent first. (Documentation and witness information requested, not yet independently verified.)
- **Per Heyman's account:** the positions TRORC took in the case were never authorized or even discussed at any TRORC meeting; they were staff's own unilateral decisions. (Not yet independently verified.)
- **Per Heyman's account:** Geiger separately testified to the Legislature on TRORC letterhead, taking a policy position that no Commissioner had approved or was even told about in advance. (Not yet checked against the Legislature's own testimony record.)
- **What is independently confirmed:** TRORC's positions in the underlying Act 250 proceedings did not prevail, and the applicant ultimately secured an exemption after roughly five years. Heyman estimates the legal costs to the applicant at over a million dollars; that figure is his own estimate, not independently confirmed.
- Todd Heyman, owner of Fat Sheep Farm in Hartland and a former attorney, is preparing to file a formal ethics complaint against Peter Gregory and expects to file shortly. He is a friend of the Peace Field Farm owners and runs a comparable farm business. The account above is his, drawn from that proximity rather than from being a party himself.
- He has also spoken from his own experience of Act 250 jurisdiction, and that experience bears directly on this Committee's work. Heyman is a trained attorney, and he has said he wishes he had hired counsel specializing in Act 250 from the outset. The process consumed substantial time and money, and his own legal training was not enough to navigate it. If a lawyer cannot work through Act 250 jurisdiction unaided, the question the Legislature should sit with is *how an ordinary Vermont landowner is expected to, should they be unlucky enough to trigger it.*
- He is willing to testify to the Committee directly, on October 8 or at any point thereafter. Neil Ryan, a farmer and land rights advocate from Corinth, is likewise available. Ryan filed both Open Meeting Law complaints against TRORC, and he testified on Act 181 from the perspective of rural farmers and landowner rights, which is the constituency these reclassifications land on hardest.

6. No One Is Watching the Watchers

TRORC's own governing documents, its bylaws and Code of Conduct, contain no mechanism to discipline or remove staff for misconduct. That gap is the reason none of the above has had any consequence.

- This is not limited to personal conduct. Across four formal written submissions since July, Vershire officials and I raised specific, answerable requests. Many remain unaddressed even after TRORC published its full 294-page Responsiveness Document on August 31. Each one is information a town needs before it can evaluate what is being done to its own land.
- **Parcel-level data.** TRORC will not tell Vershire which parcels are changing classification, or from what to what; it only sent us a letter indicating that parcels across seven categories are being reclassified. It points landowners instead to a self-service map and expects each of them to find their own property, interpret the lines, and work out what the new category means. Not everyone has the access or the training to do that. The reasonable process, and the one every RPC should be required to follow, is to supply each town a list of parcels changing classification, especially those moving into Rural Conservation, the most restrictive

category. That designation follows the land permanently. It affects what an owner may do, what the property is worth, and what the town's grand list is worth.

- **The promise to return to Vershire with new maps.** At a July 2025 meeting, recorded in the minutes, TRORC committed to come back to Vershire with updated maps and explain them to the public. That meeting never happened; they blew us off. TRORC now characterizes its public outreach as *expansive and thorough*. The volume of objections this plan has generated is the evidence against that claim.
- **Per-town land use percentages.** I asked repeatedly for the percentage of each town's land falling into each Future Land Use category. TRORC published only a region-wide *aggregate* on its map page. Every town has a right to know what share of its own territory is being placed in each category. That request is still ignored.
- **Environmental justice.** LURB's review specifically asked TRORC to show who benefits and who is adversely affected by these designations. TRORC did not perform that analysis. It said the analysis would be addressed later. That is not a response to a finding of non-compliance; it is a deferral, and LURB's finding stands ignored.
- My own land sits in the Route 113 and Parker Road corridor with direct access to a state-maintained highway. I asked that it remain Rural General, as it is today, not forest/ag. Owning woods is not a reason to reclassify land into a more restrictive category. The wildlife is not offended that they graze on rural general land. Nobody can evaluate whether such a reclassification is reasonable without the data above, which is the point.
- Complaints to VLCT have produced sympathy and some answers, but no action. The Attorney General's office took a meeting on this matter in September and a follow-up is scheduled for early October, and that inquiry remains open.
- TRORC's Executive Committee has operated for at least two years with more members than its own bylaws allow (7 EC members, vs. 6 allowed), a fact the Committee itself acknowledged on the record on September 14, 2026, then took no obvious corrective action.
- Vermont's own Municipal Assistance Center, the League of Cities and Towns' legal service, confirmed in writing to a TRORC Commissioner that regional planning commissions fall outside the state's Municipal Code of Ethics entirely, because state law defines "municipality" as a town, village, or city only. There is currently no clear venue to bring an ethics complaint against RPC staff at all.

The diagram below is the simplest way to say it: by law, Commissioners run TRORC and staff answer to them. In practice, it runs the other way, and has for many years.

Who's Really Running TRORC?

How It's Supposed to Work

Vermont statute, 24 V.S.A. § 4341

30 Town-Appointed Commissioners

The governing body, accountable to their own
Selectboards



**direct, supervise,
and set policy for**

TRORC Staff

Executive Director and Senior Planner,
carrying out the Board's direction

How It Actually Works

What commissioners and the public experience

2 Long-Tenured Staff Members

Executive Director, in the role since 1997, and
Senior Planner



**control the agenda,
information, and outcome**

30 Volunteer Commissioners, the Board Chair, and the Public

Denied information, muted, and overruled

Commissioners are, in law, staff's supervisors. In practice the reverse has held for years, and no state body has intervened.

7. Why Staff is Emboldened to Mandate: The Supreme Court Already Ruled

There is a reason mandatory language in a regional plan is not an academic question. In 2016, the Vermont Supreme Court decided *In re B&M Realty, LLC*, 2016 VT 114, a case arising from TRORC's own regional plan. A developer had won approval at the Environmental Court for a multi-phase commercial project at Interstate 89's Exit 1 in Hartford. The Supreme Court reversed and the project died, holding that TRORC's plan provisions were not aspirational but mandatory and enforceable in Act 250.

The Court found the provisions "reinforce each other in establishing a clear and mandatory framework for development," such that "a reasonable person can discern what is prohibited."

That decision is the legal foundation underneath every objection in this briefing. When TRORC writes "shall" and "must" into a regional plan, which it did roughly 273 times, it is not guidance. It is a rule the courts will enforce against a landowner in an Act 250 proceeding. It is why TRORC fought to retain roughly 40 percent of its mandatory language after public comment, and why "it is only a plan" is not a responsive answer to anyone asking what a reclassification will do to their property.

It also explains the institutional arrogance on display. TRORC has been told by the state's highest court that its plan language binds. What it has never been told is that anyone can hold it accountable for how that language gets written, by whom, or through what public process. That is the gap the Legislature can close. The Court was construing the statute the Legislature wrote, and the Legislature can amend it.

The pattern is also longer than this plan cycle. The Court affirmed in 2016 that TRORC's plan language binds. In 2019 the Town of Hartford brought objections to the Commission seeking to moderate that language and was voted down. In 2026, TRORC is expanding mandatory language again.

I want to be clear; this is not one town's noisy complaint. Bruce Riddle, a Town of Hartford staff member and TRORC alternate commissioner, has raised these objections for years. Writing in August 2026, he noted that the arguments Vershire and others are making now "raise some of the same arguments Hartford presented to the Commission in 2019. For the most part, at a Commission vote, we lost."

He also put the capacity problem plainly. Hartford employs four professional staff who work on land use. Most towns have none at all, only volunteers. And the Land Use chapter, which he and others found the hardest in the plan, is exactly where that gap does the most damage.

If Hartford, with four professional land use staff, cannot keep pace with TRORC's process, a town like Vershire running on volunteers has no chance. **That imbalance is the mechanism by which two staff members come to set policy for thirty towns.** Act 181 states that control should remain as local as possible. Towns know their own land. Regional commissions can and should offer guidance, technical support, and data. They should not dictate, and they should not use funding and permitting leverage to extract compliance.

8. Defying State Oversight, in TRORC's Own Words

Vermont's Land Use Review Board (LURB) is the state body responsible for determining whether TRORC's regional plan complies with the law. When LURB asked TRORC to justify or revise several mandatory policies in its preapplication review, TRORC's staff response was not to address the substance. It was to question whether LURB had the authority to ask in the first place. Five examples, quoted directly from TRORC's own August 31, [2026 response document](#):

- On LURB's request that TRORC show real community support for its mandatory policies, not just a Board vote: "...it is not our place to second guess the Legislature on this." (p. 279)
- On LURB's request that TRORC show its rural-land policies won't unfairly burden lower-income, senior, and rural residents: "TRORC does not believe that there is any constitutional infringement due to the draft Plan content..." (p. 279)
- On LURB's finding that some of TRORC's rules function more like local zoning decisions than regional ones: "We do not see where that definition is within the purview of the LURB to judge..." (p. 280)
- On LURB's request that TRORC justify a mandatory farmland policy: "TRORC does not think that the Legislature enabled the LURB to approve or disapprove of policies..." (p. 291)
- On LURB's finding that it could not confirm the plan is compatible with individual town plans, and its request for supporting evidence: TRORC simply restated its conclusion that the plans are compatible, rather than supplying the evidence LURB had actually asked for. (p. 282)

LURB is the body the Legislature created to check exactly this kind of plan. TRORC's own written record shows staff treating that oversight as optional, if a bit pesky.

9. Ideas: What the State Can Do Now

Every existing channel that we know of has been tried. TRORC's own Executive Committee and VLCT have each declined to act or lack the authority to do so. An inquiry with the Attorney General's office is open and a follow-up is scheduled, but no determination has been made and no mechanism exists to compel one. That leaves the state's elected leadership, through the very oversight mechanism the Legislature just created.

Immediately

- **Legislative Oversight Committee (S.325):** take this pattern up formally at the October 8 meeting as a concrete test case for the Committee's mandate, rather than a one-off complaint. This history predates S.325's passage and runs through the debate that produced it. Bring in those cited in this document to offer testimony to our lived experiences.
- **Attorney General's Office:** an inquiry is underway following a September meeting, with a follow-up scheduled. The ask is that it proceed as an actual investigation rather than a referral back to TRORC, covering the Open Meeting Law violations and the Peace Field Act 250 conduct, where sworn witnesses are available.
- **VLCT:** take a public position that regional commissions answer to their member towns, and support a legislative fix rather than treating this as a local personnel matter.
- **Direct intervention:** a conversation with TRORC's Board Chair and full Board. Individual members have shown sympathy, but the Board has neither a tool in its own bylaws to discipline the Executive Director or Senior Planner, nor, on the record to date, the will to try.

Next Legislative Session

What follows is offered as suggestions, not expert prescription. Much of it comes from people closer to these questions than I am. Neil Ryan, a farmer in Corinth who has testified on Act 181 from the perspective of rural farmers and landowner rights; Todd Heyman, who owns Fat Sheep Farm in Hartland and has been through Act 250 jurisdiction himself; and Sam Lincoln, who runs a logging and forestry company in Randolph and has testified on the forest products industry, land use, and related matters. Working groups are already doing some of this work, including the Land Use Review Board's working group on Accessory On-Farm Businesses, on which Todd Heyman serves. The strongest version of any reform here will come from widening that circle rather than narrowing it. More community involvement, not less.

- **Close the discipline gap.** Vermont's regional planning commission statute, 24 V.S.A. Chapter 117, contains no removal-for-cause, discipline, or complaint-resolution process for RPC staff, the kind of mechanism that exists for state employees under the ethics code.
- **Require responsiveness to member towns.** Require regional commissions to make Commissioner contact information available to the Commissioners themselves, and set a minimum standard of responsiveness to formal written requests from member towns.
- **Bring RPCs inside the Municipal Code of Ethics.** 24 V.S.A. § 1991(13) defines "municipality" as a town, village or city only, which is why there is currently no venue at all for an ethics complaint against RPC staff.
- **Require elected municipal officials on RPC governing boards.** 24 V.S.A. § 4342 is silent on what role an appointed member must hold, only two of the eleven RPCs require it in their own bylaws, and selectboard members hold 57 of 582 commissioner seats statewide, or 9.8%. This is the one element of the Council of Governments model worth adopting on its own.
- **Require annual Open Meeting Law and governance training.** All RPC staff and leadership should be required to complete annual training on the Open Meeting Law and related governance obligations. Several of the incidents in this briefing turn on basic procedural requirements that were either not known or not observed.
- **Require parcel-level disclosure before reclassification.** Before any Future Land Use reclassification takes effect, require the RPC to supply each member town a list of the parcels changing category and what they are changing to, rather than directing individual landowners to a self-service map.
- **Much of this the Board could address itself.** TRORC's bylaws and Code of Conduct need substantial revision, particularly on staff accountability, and that is the Board's own work to do if there is appetite for it. On the record to date there has not been. Barring that, it will take legislative action.

- **This gap is about to matter more, not less.** The February 2025 NADO assessment, commissioned through VAPDA, suggests a shift to a Council of Governments (COG) model its primary governance recommendation (p. 11).

H.421 would carry that out: introduced February 27, 2025 by Rep. James Masland of Thetford as sole sponsor, it would require every regional planning commission to establish a council of governments with its municipalities by July 1, 2027. It had no hearings, no votes, and remains in House Government Operations.

One piece of it is the reform suggested above: council representatives must be elected municipal officials. What's concerning is the rest of the requirements in the bill. It would let a council "exercise any power, privilege, or authority capable of exercise by a member municipality," excluding only essential legislative powers, taxing authority, and eminent domain. That is a substantial expansion, and on this record it would land on the same staff and the same accountability vacuum. NADO describes these councils as voluntary, whereas H.421 would make them mandatory.

Peter Gregory is a former president of the organization that commissioned the study recommending this shift, and has repeatedly briefed TRORC's Board in favor of it. That is documented institutional alignment, not a proven personal conflict, and exactly the kind of relationship the Legislature should require RPC leadership to disclose before regional staff are handed broader authority.

10. Documentation Available on Request

This summary is deliberately short – or at least not overly long. Every item above is backed by a written record: emails, meeting recordings and timestamps, official TRORC and LURB documents, and a detailed complaint currently in draft form and expected to be filed shortly. Full documentation, including a citation to the specific law or TRORC policy each item is alleged to violate, is available immediately on request.

Notes and Sources

1. Peter Gregory quote, April 8, 2026 Executive Committee meeting (timestamp ~1:21:18): confirmed independently by the Citizens Petition Letter (July 16, 2026, 120 signatures) and TRORC's own August 31, 2026 Responsiveness Document, p. 153.
2. Open Meeting Law: 1 V.S.A. §312 (notice and public-participation requirements); 1 V.S.A. §313 (executive session limits); 1 V.S.A. §314 (enforcement).
3. Regional planning commission authority and duties: 24 V.S.A. §4341 (creation, political-subdivision status); 24 V.S.A. §4345 (technical assistance duties; consent required to enter private land, §4345(9)); 24 V.S.A. §4348 (regional plan adoption and public-participation requirement).
4. State ethics and conduct obligations: 3 V.S.A. §1203(j) (public servants must comply with law and applicable codes of conduct); 13 V.S.A. §§3006–3007 (penalties for willful neglect of a legal duty).
5. TRORC's Executive Committee cap: TRORC Bylaws (2025), Section 8.1 (four officers plus up to two additional appointed members).
6. Peace Field Farm Act 250 case: TRORC staff correspondence with the Act 250 District Commission, June 15 and August 26, 2021; complaint of Todd Heyman, prepared August 21, 2026 (currently in draft form, anticipated to be filed with the Vermont Ethics Commission; full copy available on request).
7. Draft complaint compiling the above and additional detail: Todd Heyman, prepared August 21, 2026, not yet filed as of this writing but anticipated to be filed with the Vermont Ethics Commission shortly; available for review on request.

8. TRORC's responses to LURB's preapplication findings: TRORC Responsiveness Document, August 31, 2026, pp. 279–282, 291.
9. RPCs outside the Municipal Code of Ethics: 24 V.S.A. §1991(13) (defining “municipality” as a town, village, or city); confirmed in writing by VLCT's Municipal Assistance Center, September 2026 legal inquiry response.
10. NADO/VAPDA study and H.421: Statewide RPC Network Assessment (NADO Research Foundation, February 2025), primary governance recommendation at p. 11; H.421, "An act relating to the authority to create a regional council of governments," introduced by Rep. Masland of Thetford, 2025–2026 session, not enacted; TRORC Board and Executive Committee minutes, 2023–2026, documenting Gregory's reports on the proposal. This is a preliminary public-record review; it establishes institutional alignment, not a proven personal conflict of interest.
11. Commissioner contact-list comparison: Bill Emmons (chair, Pomfret Planning Commission) email request to TRORC staff, January 13, 2025, and receipt of full commissioner list, January 14, 2025; Michelle Massa's written requests of August 14, August 20 (in person, TRORC meeting), and August 31, 2026 (11:56 AM), and receipt of the list later on August 31, 2026.
12. TRORC Abuse Policy, adopted by the TRORC Executive Committee, January 12, 2022: full text available on request.
13. 23-request tally: Massa_Grievance_Tracker.docx (prepared September 5, 2026), tracking every distinct ask across the Vershire PC & Selectboard Letter (7/14/26), the Citizen Petition Letter (7/16/26, 120 signatures), Hearing Remarks to TRORC and LURB (7/29–30/26), and the LURB Formal Comment (8/6/26), cross-checked against TRORC's August 31, 2026 Responsiveness Document.

Resources and Links

Michelle Massa's analyses (open access)

[Full research folder, all TRORC plan comments, Open Meeting Law filings, summaries and analyses in one place](#)
[Analysis of TRORC's August 31, 2026 suggested edits](#)
[Analysis of LURB's August 7 preapplication response](#)
[Four cycles of the TRORC plan, 2017 to present](#)
[Vermont's RPCs: structure, accountability, and funding](#)
[Meeting summary, TRORC Executive Committee meeting of September 14, 2026](#)
[Neil Ryan, Notice of Alleged Open Meeting Law Violation and Request for Cure, September 15, 2026](#)

Statutes

[Open Meeting Law, definitions, 1 V.S.A. § 310](#)
[Open Meeting Law, right to attend, 1 V.S.A. § 312](#)
[Open Meeting Law, executive sessions, 1 V.S.A. § 313](#)
[Open Meeting Law, enforcement and cure, 1 V.S.A. § 314](#)
[Creation of regional planning commissions, 24 V.S.A. § 4341](#)
[Appointment of commissioners, 24 V.S.A. § 4343](#)
[Duties of regional planning commissions, 24 V.S.A. § 4345a](#)
[Adoption of the regional plan and formal objections, 24 V.S.A. § 4348](#)

Case law, official documents, and reporting

[In re B&M Realty, LLC, 2016 VT 114, full opinion](#)
[Case summary, Vermont Natural Resources Council](#)
[TRORC Responsiveness Document, August 31, 2026](#)
[LURB Board Preapplication Response Letter](#)
[Statewide RPC Network Assessment, NADO Research Foundation for VAPDA, February 2025](#)
[TRORC Bylaws, 2025](#)
[TRORC Code of Conduct and Conflict of Interest Policy, February 10, 2021](#)
[TRORC calendar entry, September 14, 2026 meeting](#)
[Regional plans and town expansion, VTDigger, October 27, 2019](#)
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