



July 31, 2026

Two Rivers-Ottauquechee Regional Commission
Attn: William B. Emmons, III, Chair
Peter G. Gregory, AICP, Executive Director
Kyle Katz, Planning Director
Members of the Commission
128 King Farm Road
Woodstock, VT 05091

Re: Draft 2026 Regional Plan (RPC10-0001), Future Land Use Map — request to correct the mapping of Peace Field Farm, 650–651 Pomfret Road, Woodstock

Chairman Emmons, Mr. Gregory, Mr. Katz, and Members of the Commission:

Peace Field Farm (PFF) requests a correction to the draft Future Land Use map. The grounds are three, and each is owned by the Two Rivers-Ottauquechee Regional Commission (TRORC):

- TRORC's published Future Land Use mapping methodology, which assigns categories based on what is on the land and expressly provides for splitting a property between categories;
- the facts on Pomfret Road, where the road is paved, and every abutting property to the north and south — a beauty salon, a school, Harding Place lodging, Chippers the tree and landscape company, and a run of single-family homes — is classified Rural — General, while my frontage is classified Rural — Agriculture and Forestry; and
- TRORC's own treatment of Twin Farms in Barnard, a considerably more rural setting, where one property was divided into three categories to match what stands on the ground.

While checking the map, I also found that it incorrectly shows ownership and acreage for these parcels, so I begin there. I am not asking TRORC to remap anyone else's land, nor am I requesting an exception.

1. The map has the ownership and acreage wrong

PFF comprises three pieces owned by two owners. Peacefield LLC owns 48 acres in Woodstock, east of Pomfret Road, where the on-farm restaurant and event building are located and served by the State-permitted water supply and wastewater systems. John and Maureen Holland own 82.30 acres in Woodstock, west of the road, including the farmhouse and farmland. Peacefield LLC also owns 64 acres of forest in the Town of Pomfret. Together, the properties total 194.78 acres.

The draft map assigns 131.07 acres to the Holland parcel, while its own pop-up, from the grand list, describes that parcel as 82.30 acres with a dwelling. The forty-eight-acre difference is Peacefield LLC's land east of the road — the ground the restaurant stands on. On this map, that parcel does not appear as a distinct piece of land at all. It has been absorbed into a neighboring parcel, attributed to the wrong owner, and classified as Rural — Agriculture and Forestry along with everything else. Drawn correctly, Holland holds 82 acres, and Peacefield LLC holds 112 across the two towns.

I raise this first because it bears on everything that follows. The classification of the one piece of ground where all the commercial activity occurs was made without that piece of ground appearing on the map.

2. The classification does not match the road

You can drive my frontage in about two minutes. A minute south is Rural — General: houses and a beauty salon. A minute north is Rural — General: a school and Harding Place, the lodging. Farther north, still Rural — General, are Chippers, a tree and landscape company, and neighbors who keep hayfields and livestock as I do. Mine and one other property are the only Rural — Agriculture and Forestry properties on Pomfret Road, and standing at either property line, you cannot see what changes.

TRORC's own plan classifies Rural — Agriculture and Forestry as sparsely settled land, roughly one house per seventy-seven acres, and Rural — General as roughly one per eleven. My frontage features a cluster of houses and a State-licensed restaurant on a paved road, five minutes from Woodstock village and two miles from a designated downtown, in a fully zoned town. It is not seventy-seven-acre country by TRORC's own measure. I have practiced architecture for thirty years; when the drawing does not match the site, you go back and check the drawing.

3. TRORC has already done what I am asking, in Barnard

The Future Land Use Mapping Methodology, published this month by TRORC, expressly contemplates splitting land between categories: parcels may fit best in more than one area and must sometimes be bisected, commonly when part belongs in one category and the remainder in another.

TRORC has applied that rule. Twin Farms' land in Barnard is divided into three categories on the same draft map: of 242.36 acres, 184.15 are Rural — General, where the cabins and developed area are; 56.97 are Rural — Conservation; and 1.24 are Rural — Agriculture and Forestry. The categories were designed to reflect what is actually on the ground.

That is precisely what I am asking for, and nothing more. TRORC did this for a commercial resort in Barnard. I am asking for the same treatment for a working farm in Woodstock: the ground with the buildings and permitted systems in Rural — General, and the farmland and woods behind it in Rural — Agriculture and Forestry.

4. A necessary clarification about Act 250

I want to be accurate about my position because it affects how this request should be read.

PFF is not under Act 250 jurisdiction today. The Environmental Division held that the on-farm restaurant is exempt from Act 250, and the last appeal was dismissed with prejudice. TRORC's own map legend states that the Future Land Use areas impact projects under Act 250 and do not change town zoning. As things stand, draft Policy #8 and its twenty-event cap do not bind this farm, and I am not seeking relief from a rule that presently applies to me.

That could change. If the business were altered so that meals were no longer produced primarily on the farm, or if a future jurisdictional determination brought the property within Act 250, the classification would matter greatly — and the map adopted now would govern then. A regional plan is written for the life of the plan, not for this afternoon.

But my request does not depend on any of that. Whether or not this farm is ever subject to Act 250, the land east of Pomfret Road has a licensed restaurant, an event building, and permitted water and wastewater systems, on a paved road two miles from a designated downtown, with Rural — General on every side. In fact, it is not Rural — Agriculture and Forestry. That is the correction I am requesting, and it rests on the ground rather than on my permits.

5. The AOFB cap works against the plan's own purpose for these lands

While the map is under review, I request that the Commission revisit Policy #8, lines 739 through 741, as it conflicts with the category it is in.

The draft states that the purpose of the Rural — Agriculture and Forestry category is to support the working aspects of these lands and to reduce development pressure that would impinge on those activities. It sets two goals for the category: that agriculture remain an important component of the regional landscape and economy, and that working forests provide sustainable forest products. The plan also reports that regional agriculture and forestry jobs rose 9.7 percent over the last decade, while the number and acreage of farms in the region fell.

Diversified on-farm enterprise is the principal answer Vermont farmers have to that trend, and the Legislature said so: Act 143 made the AOFB a permitted use statewide, subject to ordinary site plan review by towns. Statutory Goal 9, which this plan must further, calls for encouraging the manufacture and marketing of value-added agricultural products and the use of locally grown food. An on-farm restaurant serving what the farm produces is exactly that. A twenty-event ceiling on it does not protect the working landscape; it constrains the business that keeps the land working.

The LURB reached the same conclusion in its preapplication response. It found it unclear whether the mandatory rural agriculture and forestry policies — #1, #2, #5, and #8 — have support from member towns or the public. It observed that they could carry unintended consequences and could sit at odds with the category's two goals, and directed that they be dropped or made non-mandatory absent that showing. On Policy #8 specifically, it asked whether the AOFB limits conflict with any member town's zoning, noted that the AOFB statute was meant to work consistently across Vermont, and suggested that the policy become a recommendation for a uniform statewide rule.

6. What I am asking for

1. Correct the ownership and acreage. The Holland parcel is 82.30 acres with a dwelling, not 131.07 acres. The 48 acres east of Pomfret Road belong to Peacefield LLC, and Peacefield LLC holds 112 acres across the two towns, not 63.71 acres.
2. Classify the Woodstock land based on what is on it, using the parcel-splitting rule in TRORC's own methodology: Peacefield LLC's 48 acres east of Pomfret Road, which hold the restaurant, the event building, and their permitted water and wastewater systems, as Rural — General; and the Pomfret Road frontage of the Holland 82 acres

as Rural — General, consistent with every adjoining property. The farmland and woods behind, and all 64 acres in Pomfret, remain Rural — Agriculture and Forestry.

3. State in writing which criteria produced the line at my frontage, and when they were applied.
4. Strike the mandatory twenty-event cap at lines 739 through 741, or make it a recommendation, as the LURB has directed the Commission to consider.

In closing

I would rather resolve this with TRORC than elsewhere. The correction I am requesting is small, follows TRORC's published methodology, and aligns with what the Commission has already done elsewhere in the region. I am glad to provide the parcel screenshots for each figure above, walk the property line with anyone who wants to see it, and meet at your convenience.

In raising this now, I am not giving up my right to comment on, object to, or appeal the adopted plan. Thank you for your time.

Respectfully,

/s/ John Holland

John Holland, AIA
Peace Field Farm

cc:

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