Date: 8/9/2026

To: Two Rivers-Ottauquechee Regional Commission (TRORC)

From: Sam Lincoln, Randolph Center

Re: Comments on the TRORC draft regional plan

Cc: William Emmons, Chair TRORC; Stephanie Tyler, Randolph rep. TRORC; Randolph Selectboard; Randolph Planning Commission; Senator John Benson; Rep. Larry Satcowitz; Land Use Review Board

Thank you for presenting the draft regional plan at an informational meeting in Randolph on 7/15/2026.

I support land use planning, zoning, and voluntary conservation to guide development and protect working land; however, the TRORC draft plan is too limiting in how it guides or regulates land use. As drafted, it will deter rural business growth and does not accurately reflect what rural homeowners, landowners, and business owners are facing. I understand that TRORC has authority in some situations to place mandatory language in the plan, but I did not hear clear justification for taking what appears to be the most restrictive approach possible. Orange County is not fighting sprawl and explosive growth. We are struggling with a loss of economic opportunity and working lands infrastructure. As stated at the informational meeting by a member of the Randolph Planning Commission, our community is at a point where we're hungry for "*someone* to invest in *anything*." Over time, with good intentions, Vermont's overall regulatory regime has become too much of a deterrent to meeting housing needs and competing in the regional and global economy. The Regional Plan needs to invite more investment to our towns and avoid hindering working lands enterprises from growing however they can.

Lot Size and Density -

The plan's density standards and subdivision policies should more clearly encourage and provide incentives or model bylaws for small house lots located near existing roads or at the edge of tracts of working land. I understand from Mr. Geiger's presentation that increased density is what TRORC wants to encourage with this plan. However, I believe that subdivision patterns resulting in house lots that are too large have negatively affected otherwise usable working land in the greater Randolph area over the last 30 plus years. While clustering or denser housing is beneficial, parcel boundaries also divide ownership objectives for workable land. For example, subdividing a 100-acre parcel of working agricultural or forest land into five 20-acre parcels creates a significant challenge for farming or forest management. The footprint of a driveway, lawn, utilities, and home on a 10 or 20-acre parcel might consume only 1–2 acres of converted land. The rest of that parcel becomes a unit that may be too small to manage with modern agricultural or forestry equipment or to contain enough acreage to justify operations. It would be rare, if not impossible, to get ten new adjoining landowners to agree on a forest management approach. Even if that were possible, it would be an extraordinary administrative challenge and would only add costs to a timber-harvesting operation. Parcel boundary lines drawn on a map have a much larger impact than what it seems is being considered. Smaller lot sizes located close to roads, that do not obstruct access to larger parcels, should be considered in the plan and in guidance to municipalities. I would ask that TRORC consider mechanisms that would allow or incentivize infill or further subdivision of existing 5, 10, and 20-acre lots to increase density on previously developed parcels.

Rural Conservation Areas -

I prefer the voluntary sale of development rights to conserve land rather than land-use regulations that effectively restrict or eliminate those rights without compensation. Further, an objective analysis should be completed on the impact of this designation on the appraised and assessed values of these parcels, and it should be shared with every landowner within this designation.

Where land is designated as Rural Conservation and apparent prohibitions on development are proposed, a clear exception should be made for processing agricultural and forest commodities. Historically, agricultural and forest products were processed close to producers to minimize transportation costs, and rural enterprises that add value to the adjacent resource should not be discouraged.

Accessory On-Farm Businesses and Ag Retail –

Restrictions on the number of on-farm events, daily truck traffic, or the scale of farm stores, value-added processing facilities, and other buildings supporting agricultural enterprises are not appropriate in the Regional Plan. Agricultural enterprises that meet the statutory definition of a farm need to be able to add value to what they produce and generate revenue from their land and products. Trucking is the lifeblood of virtually every business, including farms. Daily truck traffic should not be treated as a categorical reason to prohibit accessory on-farm businesses. Farms depend on trucks to deliver feed, seed, fertilizer, fuel, parts, and other inputs and to move livestock, equipment, raw commodities, and value-added products to market.

At the Randolph meeting, in response to a question about a proposed farm store that TRORC had actively opposed, Mr. Geiger stated that “a 7,000-square-foot farm store is too large.” As commodity values decrease, some farms have been adapting by shifting to direct-to-consumer sales. Hatchland Dairy in North Haverhill, NH; McNamara Dairy/Mac’s Maple in Plainfield, NH (under construction); and Edgewater Farm in Plainfield, NH, are examples of “large” retail structures that empower their owners to capture retail revenue from value-added commodities. I have included examples from another jurisdiction because they demonstrate that entrepreneurial and forward-looking competitors within a few minutes’ drive of farms across the eastern edge of the Two Rivers area—with access to the same consumers and a similar land base—are growing and positioning themselves for the future, while farms on the Vermont side of the river face regulatory barriers. TRORC should not determine what is too large or limit what these enterprises can invest in that will sustain current and future farm owners.

Rural Unpaved Roads –

I am a rural business owner with a third generation entering the business, and we need to grow. For several years I have been looking for a location where we can build a new maintenance shop and expand our operation, preferably on a paved state highway. There have been few—essentially no—opportunities to acquire land we can afford, with the necessary zoning, on a paved road in the largest town in Orange County. Much of the land along paved roads in my area is either in a floodplain, occupied by residential development, owned by farms with no intent to subdivide, or too steep to build on. We, and others, may have no choice but to grow our rural business on unpaved roads. I request the removal or revision of policies that make development inappropriate because it may require upgrading or paving a rural gravel road.

The Two Rivers-Ottauquechee region needs opportunity. Those of us who have invested our careers in the working lands have experienced a steady loss of opportunity—the closure of sawmills, papermills, dairy processing plants, equipment dealerships, and other important support businesses. The factors that have kept the land undeveloped—commodity production, processing and markets, culture, workforce, and family legacies—are evaporating in real time. New entrepreneurs and new types of agricultural and forest-product processing must be encouraged—not limited—and allowed to operate on a commercially viable scale. Restricting that investment will put both the businesses in our region and the undeveloped landscape at an even greater disadvantage than they face today. Without a realistic approach to our region's need to remain viable in the regional and global economy, this plan looks more like gentrification than guidance for an adaptable and resilient rural economy.

Vermont is on the front line of a growing contradiction: commodity markets and lower-cost producers in the global economy suppress the value of what we produce, while the public expects the working landscape supported by that production to remain intact and retain the appearance of an earlier rural economy. Vermont's regulatory regime is making our livelihoods and economy more vulnerable to these economic forces, not more resilient. The Regional Plan should embrace and be realistic about change—including changes in how our region looks and feels—so that the next generation is encouraged to invest and grow here.