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June 10, 2022

**Via Email**

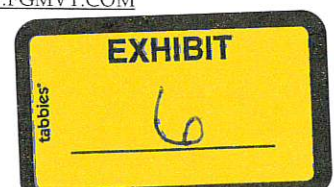
James F. Carroll, Esq.  
Carroll, Boe, Pell & Kite, P.C.  
64 Court Street  
Middlebury, VT 05753

**RE: Untimely Appeal of Bicknell Zoning Permit // Proposed Site Visit**

Dear Jim:

This Firm represents Norm Bicknell and the Bicknell Trust ("Bicknell"). Bicknell will welcome members of the Lincoln ZBA to its property, and Norm Bicknell will personally drive ZBA members to the property and answer any questions pertaining to the matters now pending. Norm's truck can carry three other people at a time, and he would be willing to take the members individually or in groups of two or three at their respective convenience. A gathering of up to three members will not constitute a quorum of the ZBA and so would not constitute a public meeting subject to open meeting requirements. If the ZBA is interested in conducting a site visit in this manner, please let me know convenient days and times and we will do our best to accommodate.

Bicknell objects to convening a public meeting at the Bicknell property. The site access driveway is approximately one mile long, and is a narrow, single-lane, steep, largely unimproved dirt road. Any effort to bring many, perhaps dozens of individuals to the site would create a public safety hazard, and also could damage the road depending on road conditions at the time. Doing so also would constitute an unacceptable liability risk for Bicknell. Furthermore, at the hearing the individuals represented by Attorney Dumont encouraged the Town to commence an enforcement action against Bicknell for various alleged violations. As evidenced by the above invitation for ZBA members to visit the site, Bicknell is confident that everything happening on the property is in full compliance with all laws and permits, including the Zoning Permit issued by the Town over a year ago. However, Norm is not interested in allowing access to individuals who are actively seeking to cause him harm.



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Very truly yours,

*David R. Cooper*

David R. Cooper, Esq.

cc Norm Bicknell  
James A. Dumont, Esq. (via email)