



To: The Vermont Department of Forests, Parks and Recreation, c/o Brad Greenough, Stewardship Forester

Subject: VMBA Public Comment re: Worcester Range Management Unit LRMP

Dear Barre District Stewardship Team,

On behalf of the Vermont Mountain Bike Association (VMBA), I thank you and the entire team working on the Draft Long Range Management Plan for the Worcester Range Management Unit for the immense amount of time and energy that they have invested. The document provides a wealth of information and clearly aims to balance many different uses in charting out the next two decades for this incredibly valuable piece of Vermont.

VMBA is deeply - and proudly - involved in the management activities outlined in this plan, principally through our Stowe Trails Partnership (STP) and Waterbury Area Trails Alliance (WATA) Chapters, each of which is a designated stewardship partner for parcels in the WRMU. Regarding the responsibilities assigned to our Chapters in the draft Plan:

- We strongly support the proposed reopening of the Brownsville trail system to mountain bikes, which will provide an additional wheeled recreation option in an area where demand has grown dramatically over the past few years. We sincerely appreciate the stakeholder engagement work that has helped chart a path to reintroducing mechanized recreation to this area, and STP is eager to work with the Department of Forests, Parks & Recreation (FPR) to pursue the necessary upgrades.
- We also are strongly in favor of the permanent establishment of winter fat biking at Perry Hill, which provides a great winter use option in response to the growing fat bike community. This would be the first LRMP that incorporates winter grooming for wheeled recreation and is possible thanks to the productive collaboration between FPR and WATA on a pilot program over the past several winters to evaluate use, impacts, and management considerations. WATA is eager to help manage this additional use of an incredibly valuable recreation area in a permanent capacity.

While the Plan is commendable on many fronts, it does fall short in two areas that were clearly articulated as compelling needs in the public scoping that preceded the report and is included in its Appendix. Firstly, despite mountain biking being the second most popular form of recreational use in the WRMU, and the fact that amount of 'mechanized' trails was considered insufficient by more public scoping respondents than any other resource, the Plan does not include any specific call to increase access for mountain biking - nor for any new trails. This seems to run contrary to the stated management goal of "Providing diverse recreational opportunities and trail systems" and certainly in contrast with public sentiment. New trail development and access are to be "explored" and "considered" when consistent with the other goals of this Management Plan, though it does not position expansion of such opportunities as a goal in and of itself.

Specifically, we believe the final Plan should actively seek proposals to add trails within the existing Recreation Areas (Perry Hill and Stowe Pinnacle), rather than simply "consider" additional trails

under the specified conditions. We would also strongly support the incorporation of specific goals to increase new trail mileage or new miles open to mechanized access. Relatedly, it seems critical that proposals for non-motorized trails in Highly Sensitive Management areas, which now make up over half of the WMRU, be encouraged - provided these projects meet the environmental preservation requirements of these areas. Amongst the most lacking recreational opportunities for mountain biking in Vermont is the ability to access more remote areas and travel on extended stretches of intersection-free trails, enabling users to immerse themselves in the experience rather than in wayfinding and navigation. The WRMU already provides such experiences to hikers through numerous trails - Waterbury, Middlesex, White Rock, Hogback, Worcester, and Skyline. With an estimated 10% of Vermonters now actively engaged in mountain biking (riding at least once per week in the summer season), we strongly encourage the potential for such opportunities to be extended to a wheeled recreation. Allowing people to sustainably access these zones is essential to our long-term appreciation for their conservation.

Our specific recommendations related to new trail development include:

- Actively support and pursue a sustainable, multi-use loop for accessing the Stowe Pinnacle trail, building off the loop system called for in the draft Plan. Pinnacle Meadows is adjacent to a large tract of land classified for General Management, and a parking area with beginner-friendly and adaptive mountain bike-optimized trails would be worth considering here. We would gladly work with STP to develop a proposal for such a project if called for in the Management Plan.
- Actively encourage expansion of trail opportunities at Perry Hill through adjunct private landowners. WATA has secured active interest from several private landowners with property adjacent to Perry Hill, allowing for new trail development without increasing trail density in the existing State Forest. We would like to see the State play an active role in working with us to develop connections to these parcels.
- Consider connections to the Brownsville trail system, which is already linked with an existing VAST trail through a State Forest Highway. Summer-use upgrades here could provide a connection with the Pinnacle Meadows area and support upgrades to the current winter-use trails, which themselves are increasingly vulnerable due to climate change in the absence of such upgrades to improve water management and drainage.
- Work with us to explore opportunities along the northeastern portion of the CC Putnam State Forest, which includes extensive semi-developed Natural lands. While the existing Worcester Range Natural Area (1.8A) already hosts an extensive network of pedestrian-only trails, there are areas like the Moss Glen Headwaters (2.1A) and nearly 1,000 acres of General Management terrain not defined by ecologically sensitive features or important wildlife habitat just below the spine of the Worcester range. New trail development here has the potential to not only provide sustainable public access but facilitate the development of new parking areas to help spread out user density.

Second, and in addition to expanding access for mountain bikes generally, the final Plan should directly address the need for more accessible recreation. Only 0.25 miles of trails in the WRMU are accessible to those with serious physical disabilities. Some level of accessibility should be considered, specifically, for the proposed sustainable loop trail system at Stowe Pinnacle and certainly as part of the upgrades to the existing trails at Brownsville. Our extensive organizational experience conducting 'Adaptive Assessments' of mountain bike-optimized trails throughout Vermont

suggests that in many cases, improvements that allow adaptive mountain bike (aMTB) access are consistent with those pursued for environmental sustainability and often improve the experience of all users. Upgrades to existing 'mechanized' trails could make them accessible to adaptive mountain bikes without noticeably affecting their character, and new access for aMTBs elsewhere in the WRMU could open up areas of the Worcestersters previously only able-bodied visitors could enjoy.

While most of the terrain in the WMRU makes true Universal Access Trails extremely difficult to achieve, trails built to adaptive mountain bike standards could be possible across much of the Management Unit. Specific areas where we believe aMTB access should be explicitly supported in the final Plan include:

- Incorporation into the proposed sustainable loop trail system at Stowe Pinnacle, as noted above, including the possible addition of beginner and aMTB-friendly trails off the Pinnacle Meadows access.
- Retrofitting of the existing Perry Hill trail system to accommodate aMTBs, where it can be achieved without altering existing trail characteristics through the removal of impediments such as narrow bridges, pinch points, and tight corners. These upgrades would also not compromise environmental sustainability and, in many cases, actually reduce erosion resulting from water and trail use. A specific example includes the gate and rock obstruction at the network entrance, which while effective in preventing ATV access, also precludes aMTB users from accessing the entire trail system.
- Incorporation of aMTB design principles as part of the proposed Brownsville trail system upgrades.
- Consideration of other opportunities for aMTB-friendly trails, such as with the proposed linkages to the Brownsville network, which could - in theory - provide an accessible connection from the upgraded Brownsville trails to the proposed accessible loop and potential aMTB trails at Pinnacle Meadows.

Again, I want to underscore VMBA's deep appreciation for our partnership with the Agency of Natural Resources and, specifically, the Department of Forests, Parks & Recreations. We are eager and committed to fulfill our responsibilities as outlined in the current draft Plan and are keen to work with you in considering our recommendations above to more actively expand sustainable recreational access and ensure opportunities for those with disabilities are being sufficiently pursued.

Thank you again for your hard work in developing this plan, and for thoughtfully considering not only our comments but those of the general public on the long-term management of our public lands.

Sincerely,

Nick Bennette

A handwritten signature in black ink, appearing to read 'Nick Bennette', with a long horizontal flourish extending to the right.

Executive Director

The Vermont Mountain Bike Association