

ACT 250 and TRAILS QUESTIONS FOR COMMENT

1. Please indicate your name, name of organization, and contact information (including email address).

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2. Is your entity a member of the Vermont Trails System?

Yes

3. Have you experienced any challenges in obtaining Act 250 permits for trails (please explain)? Please limit your response to personal experiences that you or your organization has experienced.

Yes, see attached.

4. If you or your organization has been through the Act 250 process with respect to trails, please recommend any changes including, but not limited to the following topics:

- a. How to make the process more efficient

District coordinators and judicial officers need to have a common understanding of terms and definitions in order to avoid inconsistencies in application. What is defined as “project” and the phrase “material change” needs to be addressed - what types of activities qualify as a “project” for purposes of Act 250 triggers? What outcomes constitute a “material change?”

There also needs to be a clear and shared understanding of when the disturbance threshold clock starts.

Lastly, district coordinators should have benefit of legal counsel prior to any judicial proceeding so that they fully understand the process, with an outcome of less time in the entire process and less need for an expensive judicial process.

More specifically, greater efficiency would involve

- Defining what constitutes a “project” and ensuring that district coordinators understand the application
- Synchronizing district coordinators and their interpretations of the Act
- Creating a reporting process that covers approved criteria that the
- District coordinators send to trail organizations
- Clarifying whether or not property boundaries “re-start” the disturbance

threshold, as this would be a major threat to the future of outdoor recreation in Vermont

- FPR should facilitate an annual meeting between trail organizations and Act 250 coordinators
- District coordinators having access to guidance from legal counsel prior to the judiciary process.

b. How to make the process a better fit for the unique development aspects of trails.

Those charged with applying Act 250 standards need to be educated about the Vermont State Trail System (VSTS) and how it actually functions so that they are better able to differentiate between the “project” of a commercial development and the system of low-impact recreational trails running throughout the state and traversing private property as well as state lands. Unique aspects of the trail system include the fact that it is already extensively permitted with all the regulatory oversight that entails. Also, environmental stewardship is deeply engrained in the culture of trails management.

Many small towns in Vermont rely on the state’s trail system for their economic survival. While the economic benefits of trails are high, the environmental impact is low, unlike major development projects where Act 250 should apply as originally intended. The primary goal of any good trail professional is to design and maintain a beautiful and sustainable trail. We are not only compelled to do so by existing federal, state and local laws and regulations, but also by the need to please our landowners, partners and users.

Our commitment to the environment and sustainability inspires us to protect our trails and communities by attempting to avoid sensitive areas and design and repair trails in ways that will minimize water and erosion issues. In short, no one can afford a poorly built trail on any measure.

Confusion created by inconsistent interpretation creates and places unnecessary burdens on private landowners and the volunteers that spend a great deal of personal time and energy on Vermont’s outdoor infrastructure. This real and perceived impact on landowners is of great concern given that 70% or more of Vermont’s land is privately held. The development, maintenance and use of all current and future trails in Vermont is widely dependent upon the consent, cooperation and good will of our individual private landowners and volunteers.

If trail regulation becomes unnecessarily burdensome, landowners will simply withdraw their permission for public access. Decision like these create seriously barriers between the State and its economic ambitions. Further, it will drive trail groups to “go rogue.” Vermont is filled with passionate trail builders that the Trails and Greenways Council has spent years coordinating. As a result of this coordination, trails have become one of

Vermont's highest performing investments – because of volunteers and the Trails and Greenways Council. For the most part, Vermonters did this on their own at comparatively very, very low cost to the State.

- c. Are Act 250 jurisdictional triggers with respect to trails clear? If not, how should the jurisdictional triggers be clarified?

No, they are not clear. They are not well defined, nor are they commonly and consistently understood and applied (see answer 4a). Wherever possible (and appropriate), the trails system makes use of existing trails. We don't feel that rehabilitating these trails for low-impact recreational use should be considered a "material change," for purposes of triggering Act 250, especially when, rather than degrading the environment, trails management actually enhances the environment by preventing run-off into rivers and streams created by flooded and deteriorated old logging roads and other abandoned road beds.

5. What are the strengths of Act 250's regulation of trails?

The Act seems popular among a certain segment of the public who might otherwise not feel as though they have a voice in the regulation of Act 250 projects. Adjoining neighbors who fear increased noise or traffic could be an example of this type of stakeholder. That being said, there should be a limit on how much one person or party can appeal a decision, as we have seen project stalled unnecessarily through an ongoing re-appeal process. There have been instances where the partners of FPR employees triggering Act 250 where there is a philosophical divide regarding more trails (Danville is one such example if this).

6. How is Act 250 beneficial to the environmental quality of the state with respect to the regulation of trails?

Existing permitting (stormwater, wetlands, etc.) for trails is what ensures environmental protection, along with the ongoing and culturally engrained commitment to environmental quality in the organizations that maintain the trail system. For trails, therefore, Act 250 is a redundant layer of compliance.

7. Which [Act 250 criteria](#) are most relevant with respect to the regulation of trails (please explain)?

See response to question 6.

8. Which [Act 250 criteria](#) are least relevant with respect to the regulation of trail projects (please explain)?

See Act 47 document, p. 5, 3A: "The purpose of Act 250 jurisdictional threshold is to focus Act 250 review on projects that have the greatest potential for significant impact due to their size or scope, or where the forms of adequate regulatory review do not exist." We don't believe the Vermont trail system constitutes "greatest potential for significant impact" on environmental quality, and an adequate layer of regulatory review already exists in the permitting process. Given the limited resources of the state, especially in

staffing required to review and rule on Act 250 applications, it seems state resources would be better spent in addressing the challenges posed by large commercial development.

9. Should all trail projects be exempt from Act 250 review? If so, what makes development of recreational trail projects different from other development that is subject to Act 250?

No, but there should be a clear and logical threshold for triggers and a clear understanding of how/when the Act should not be triggered among all district coordinators.

10. Should some trail projects be exempt from Act 250 review?

a. If yes, please explain which types of trail projects should be exempt, and why.

We do not see why there should be an Act 250 trigger every time a section of new trail connects two existing sections. In other contexts (e.g., grant funding, user feedback, etc.), interconnectedness is seen as desirable rather than inspiring suspicion.

Master planning is difficult as landowners often opt into participating in a local group's trail projects years after the project begins. It is often the case that landowner "B" is interested in working with a local group years after Landowners "A" and "C" are already participating. If property boundaries are ignored and Act 250 is triggered for landowners A and C – the project is essentially over. More importantly, interconnectedness of trails holds tremendous economic opportunities for Vermont and can be done in a manner that conserves forests, protects open space and creates access for more people.

11. Do you have any recommendations for an alternative regulatory scheme for trail projects in the State of Vermont? Please share your thoughts.

As a group, the trails organizations actually have a specific process to recommend that could give those charged with Act 250 implementation a better comfort level that they have oversight while, at the same time, not burdening trail organizations and private landowners with redundant regulatory compliance. (See below.)

a. Should trails be subject to some sort of "general permit"?

Trails are already permitted as mentioned in question #6. Also, VMBA already has a cooperative agreement with the State that stipulates our trail building standards.

b. If so, what criteria should the general permit cover and how should terms of the general permit be enforced?

c. Do you have any ideas about a possible trail development oversight program managed under the Agency of Natural Resources? Please explain.

Each trail organization should submit reports, to be filed annually, for trail undergoing maintenance work with ANR and FPR with a 5-year "good standing" status. We would be pleased to have the opportunity to discuss this recommendation further.

Act 250 Case Studies

1. Local trail group #1 - Woodstock
2. Local trail group #2 - Dansville
3. Individual relocating to VT
4. Resort seeking trails

Woodstock Area Mountain Bike Association

Overview

Woodstock Area Mountain Bike Association (WAMBA) was formed in 2016 as a chapter of the Vermont Mountain Bike Association. Our mission is to work with landowners, public officials, and other stakeholders to build, maintain, and preserve trails for non-motorized public recreation in the Woodstock area, and encourage opportunities to experience them. Through our efforts, we hope to enhance community health, promote economic development, and foster a passion for the protection and enjoyment our region's magnificent natural landscapes.

In 2016, our first membership year, we had 46 discrete memberships (family and individual). By 2017 our membership expanded to 74 discrete memberships (family, individual, add-on). Currently, our email distribution list reaches over 200 people and our Facebook posts have reached up to 5,000 people. Active members in our growing mountain bike community include men, women, and children.

Securing enduring access to and improving existing trails for Mountain Bike use in and around Woodstock has been a primary focus for WAMBA over the last two years. The Woodstock region, like much of Vermont, is endowed with natural beauty and an environment that offers incredible outdoor recreation potential. While certain recreation resources are well established (hiking trails, horseback riding trails, and ski trails), mountain biking has been historically developed "under the radar." This makes access to riding difficult for new residents, visitors, and newcomers to the sport.

WAMBA decided to focus public trail access on land owned by the Woodstock Aqueduct Company for several reasons: (1) the Woodstock Aqueduct Company, the landowner, has historically allowed the property to be used by the public for recreation, including hunting, fishing snowmobiling, hiking, biking, and cross country skiing, (2) the property is near the downtown Woodstock area and local schools, and (3) a network of single track trails, logging roads, and class IV road already exist on the property. In 2016, after working with VMBA to develop a model landowner agreement for public mountain bike trails on private land, we entered into a 10-year agreement with the Woodstock Aqueduct Company - ensuring continued public access to the Aqueduct property. Additionally, WAMBA has supported the Woodstock Inn's efforts to develop two fee-based mountain bike trail networks: at Suicide Six in South Pomfret and at Mt. Peg in Woodstock.

Trail Improvements

Over the course of two years WAMBA has organized and facilitated over 15 trail work sessions at the Aqueduct and Mt. Peg trails. Our members and partners have contributed hundreds of volunteer hours to improve the durability, sustainability and overall user experience of the trail networks in Woodstock for the benefit of the community at large.

In the Spring of 2017, Senator Allison Clarkson, Chair of the Woodstock Trails Partnership, recognized WAMBA's efforts to promote and steward trail-based recreation within our community and awarded WAMBA with the 2017 Annette Compton Trails Stewardship for "impressive trail stewardship on the Woodstock Aqueduct land."

While our organization has invested significant time into trail improvements on the ground, the bulk of our time and efforts to date have been spent attempting to change biased public perceptions about mountain biking, and shepherding our proposed singletrack trail project through permit processes that are designed to review development parameters for buildings and hard infrastructure.

Local Permitting and Public Engagement

In order to establish these public trail networks, WAMBA has coalesced, grown, and mobilized the local mountain bike and trail advocate communities; and fostered public engagement and participation in the local in the local political conversation and zoning process.

WAMBA supported the Woodstock Inn's efforts to obtain a Conditional Use Permit for their fee-based (commercial) singletrack network on Mt. Peg. WAMBA members and advocates attended and testified at several public hearings before the Woodstock Conservation Commission and the Zoning Board and participated in several site visits with Commission and Board members.

Following the Inn's Conditional Use Permit, the Town of Woodstock required WAMBA to apply for a Conditional Use Permit for the Woodstock Aqueduct Trail network. WAMBA officers prepared the application and supplemental material, which included extensive maps, narratives, testimony, and third-party reports about the impacts of mountain bike trails. We mobilized the local mountain bike and trail advocate communities and organized participation in the permit proceeding and facilitated several site visits with the local Conservation Commission and Zoning Board members.

WAMBA also supported the Woodstock Inn's efforts to expand their mountain bike trail offerings to the Suicide Six ski area in Pomfret, Vermont. WAMBA members and advocates attended a 4-hour Act 250 hearing, and two of our officers provided testimony during that proceeding.

Act 250

In December of 2016, WAMBA applied for a grant through the Recreational Trail Program (RTP) with the intention of using the funds to hire local contractors to build a new trail and expand an existing parking area at the Aqueduct property. The project has the potential to create several obvious benefits to the local economy. First, by improving a public resource, Woodstock can increase commerce and tax revenues by retaining residents who otherwise would move,

attracting new residents looking for a healthy and vibrant community, and attracting visitors during all seasons. Additionally, the grant funds would be paid directly to local contractors, who otherwise struggle to make a living in our state due to the high cost of living and relatively sparse job opportunities.

In the process of applying for an RTP grant to fund trail crews in the summer of 2018, we were told that WAMBA would be required to submit an Act 250 permit amendment for the trail improvement project proposed in the grant application. Previous diligence and conversations with local zoning officials did not alert us to the existence of an Act 250 permit affecting the Woodstock Aqueduct property, issued in 1989 for the purpose of constructing a water tank. **When we reviewed the 1989 permit, it had an expiration date of 2009; however, we were subsequently told by the district coordinator that, by statute, the permits were set to never expire.**

Without an underlying permit, trails alone trigger Act 250 when the total amount of disturbance exceeds 10 acres. However, if there is an existing Act 250 permit associated with the land, and **if the local coordinator decides** that the trails might have an adverse impact on any of the 10 Act 250 criteria, a full blown Act 250 permit amendment (as opposed to an administrative amendment) is required. If the trails were not viewed as having the potential to have an adverse impact on any of the Act 250 criteria, then the project would have triggered, at most, an administrative amendment. There is a considerable difference between an administrative and full amendment.

The full amendment requires the completion of a new complete Act 250 application with exhibits, demonstrating that the project does not have an adverse impact on any of the Act 250 criteria. It involves responding to nearly 23 pages of ambiguous questions which are mostly drafted with traditional forms of development in mind and requires reference to external inventories and databases (including the ANR Atlas Mapping Tool and the NRCS soil database). A "one size fits all" permitting approach, as Act 250 has been applied in this case, fails to acknowledge the difference between a trail and industrial development. It creates an inordinate burden on applicants and seriously jeopardizes good projects like this one from coming to fruition.

While our local Act 250 coordinator has been accessible and responsive; the Act 250 process itself is simply unduly onerous for a low impact and environmentally benign public recreation resource and is borderline untenable for our small chapter. After going through the proper steps to gain approval via the local zoning process, Act 250, as applied to this project, may become the regulatory straw that breaks our volunteer backs.

As a volunteer organization run by young Vermonters with families and careers, pulling together an Act 250 application is onerous, and we barely have the time to get it done. In the last 2 weeks, three of our chapter officers have invested approximately 15 hours in completing the initial application, and we are not yet finished. Once the application is received and processed, it is unclear to us how many additional hours will be required for site visits, hearings, etc. The time spent on this proceeding is time taken away from our jobs and our families.

Certainly, the prospect of going through this process prevents other volunteers across the state from undertaking community trail projects and encourages riders to keep their trail systems out of the Public review process.

The reality is that the realization of the Act 250 requirements has introduced uncertainty as to whether we will be able to proceed with the proposed project this Summer, and we've had to tell our contractors that their summer jobs are now uncertain.

Conclusion

The trails created by intensive volunteer action and community-based fundraising provide great benefits to residents and visitors of our State. Public trails are a resource to keep and draw a talented work-force, an accessible culture that promotes healthy habits and past times, a place for communities to form and gather, a past time that encourages a deep appreciation for scenic and natural resources, and climate adaptation for our ski economy as a viable off season complement.

We encourage Vermont leadership to change the current approach to regulating single-track trail systems. Without real change to how trail projects are regulated by the State of Vermont, Volunteer trail organizations will struggle under the undue regulatory burden of a law that applies no nuance to the level of actual impacts, and the creation of public trail networks will be stifled.

#2 – Caledonia Trails Collaborative

Warren Foster's interpretation in Danville and its impact on interconnectivity across multiple landowners could have seriously negative impacts on visions of world-class outdoor recreation available to the state, and to every current major trail organization in the state.

#3 – Individual relocating to Vermont

I am a member of VMBA and have enjoyed mountain biking in Vermont for the past ten years even though I am not (yet) a resident of the state.

I write to you to express my frustration with the existing Act 250 regulatory environment in Vermont, which serves to inhibit the development of trails on private and public land through the imposition of excessively onerous permitting requirements and opaque rules and regulations.

Although I have been enjoying the mountain biking trails of Vermont for the past 10 years, I only became aware of the absurd regulatory environment as it relates to the trails after I started exploring the possibility of investing in land and relocating to Vermont. Regrettably, what I found has forced me to put my plans on hold.

By way of introduction, I have recently taken early retirement after a 30-year career as a senior executive with a global mining company, where I was a member of the group executive and responsible for sustainable development and stakeholder management in the 20 countries

where the company operates. I retired early in order to escape the corporate rat-race and to live a simpler life.

Our family's plan is to move to a small town somewhere in rural America where we could get involved in the local community and immerse ourselves in outdoor activities, in particular mountain biking, which is our passion. I also hope to volunteer my experience in sustainable development in service of our new community, wherever that is.

Our vision is to buy a piece of land in or near an existing four seasons trail network with a view to extending the trails onto our own land. The intention is for our two adult children and their spouses to eventually join us. My daughter is an accomplished artist and my son is an entrepreneur in the mountain biking industry.

After a year-long search and many miles of mountain biking in Vermont, California, Utah, Montana, the Dakotas, Colorado and the Carolinas, we decided on Vermont and, in particular, the town of West Windsor/Brownsville.

We chose Brownsville for a number of reasons but, in particular, because of the community's enthusiasm for mountain biking as a potential economic driver for the community. As you may know, after the closure of the ski resort on Mount Ascutney in 2011, Brownsville went into a near terminal decline. In recent years the people of Brownsville have recognized the potential of outdoor recreation, and mountain biking specifically, to revitalize the local economy. The local trails organization, STAB, as well as Ascutney Outdoors together with the town council, have done commendable work to advance mountain biking infrastructure, despite a particularly onerous regulatory environment.

Today there is a network of more than 30 miles of "legal" mountain biking trails on public lands around the base of Mount Ascutney and probably more than double that in "illegal" or secret trails on private land in the surrounding community. It is important to note that most of the "illegal" or secret trails exist with the informal approval of the landowners. **The combined "legal" and "illegal" trail network in the Brownsville area is one of the best networks of its kind in the country and, unfortunately, one of the best kept secrets in the mountain biking community!** A quick look at the Strava heatmap for the area shows how extensive the secret trail network really is.

While the existence of the trail network is commendable, it is disturbing that such an invaluable resource exists only in the shadows. In researching the local property market as well as the mountain biking infrastructure, I tried to understand why most of the best trails in the Brownsville area are kept secret and not marketed as the valuable community resource that it could be. In my discussions with the people of Brownsville on this matter, everybody is in agreement that Act 250 in its current form is the single most important constraint on the development of Brownsville as a leading trails destination.

In Brownsville, where Act 250 applies to the Town Forest which hosts most of the community's "legal" trails, they cannot do any trail improvements without going through a time- and cost-intensive permit amendment process, requiring review by multiple state agencies. They just went through this process to get approval for a simple path to be mowed through a working hay field! Whenever they want to improve a trail, say to mitigate erosion risks, they need to apply for another amendment! This process is an exceptional obstacle that affects not only trail development but, by extension, the town's economic development potential. **Needless to say that all of this frustrating work is undertaken by unpaid community volunteers.**

For private landowners who fall under Act 250, it serves as a total disincentive to host legal trails on their land. Likewise, for landowners who are not currently under the Act, the fear of triggering a review due to trail development is a major concern, even if the actual risk is fairly low. In these cases, there is a general lack of understanding of Act 250, carefully cultivated through little apparent effort on the part of Act 250 coordinators to clarify the situation. The result is that many landowners refuse to make their land available for trails development, while others allow trails, but only if they are kept secret and under the radar.

As a consequence, the vast majority of the awesome trails in the Brownsville area are "illegal" and under the radar. These trails are not mapped, are kept secret and only local people who know the area ride them. As a result these trails cannot form part of any economic development or marketing plans to promote the Brownsville area to visiting mountain bikers.

Because of this I had to shelve my plans to relocate to Brownsville until this situation improves. While I can buy an awesome piece of land right in the middle of one of the best trail networks in the country, the trails effectively do not exist and cannot be used by anybody but local people, and then only furtively. Who would want to invest into such a restrictive environment?

Trail networks with 30 miles of legal trails are a dime a dozen through-out the region but networks with close to 100 miles of diverse trails in a compact geographic area surrounding a quintessentially New England village are truly rare.

If Act 250 is reformed to allow for less cumbersome regulation of trails on both public and private land, Brownsville has the potential to become one of America's premier trail destinations. The bonus is that the trails already exist, albeit secretly! All that we need is a responsive regulatory environment that would encourage these trails to be brought out of the shadows so that they can work for the community.

As a sustainable development professional that has directed community and economic development projects in 20 countries around the world for 30 years, it strikes me that Vermont's trails-based outdoor recreation industry will never realize its full potential unless the restrictive regulatory environment of Act 250 is reformed. Sustainable development 101

teaches one that an enabling regulatory environment is a prerequisite for sustainable economic and community development.

I hope that VMBA would see its way clear to make the reform of Act 250 its highest priority.

Yours sincerely

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#4 Resort wishing to expand

I have worked for the Woodstock Inn & Resort since the fall of 2015 as the Recreational Trails and Nordic Center Director. I also serve on the Board of the Woodstock Area Mountain Bike Association (WAMBA). In these capacities I have had the opportunity work on several trail related projects that have needed both local and State Act 250 permitting. The following describes the process for two projects that I have been directly involved in. Mt Peg Nordic and Mountain Bike Trail system.

In the spring of 2015 the Inn began an extensive forestry project on Mt Peg in accordance with its forest management plan. It was understood at the outset of this project that the Nordic Ski trails, which were used as access points for logging equipment, would need to be re-graded and any culverts damaged replaced. Due to concerns raised by an abutter over crossing the Kedron Brook by logging equipment, the State was asked to review the project. The crossing of the brook was found to be in accordance with logging regulations, however once on-site, the State officials decided to explore the logging operation further.

It was decided during this site visit, that the clean-up of the Nordic Ski trails from the logging operation constituted "trail improvements" thus triggering the need for an amendment to our Act 250 permit on the property. This required multiple visits from ANR officials to look at the "trail improvements" including culverts managing water under the trails. We were required to change the size of 2 of the culverts as well as change the orientation of one culvert. Additionally, grass seed, erosion matting, and rip-rap were required on various sections of trail to be in compliance. All of this came at a considerable cost to the Inn.

In the fall of 2016, the Town of Woodstock requested that the Inn file for a Conditional Use permit for summer use of the Ski trails and the construction of Mountain Bike trails that had begun that spring. As this local permitting process began, we were informed that an Act 250 amendment would be required for these trails as well. This required GPS mapping of all proposed trails and a site visit from ANR to review trails that crossed intermittent streams as well as ones that were in proximity to the Kedron Brook buffer zone.

These two projects cost the Inn \$4000 in permitting fees and hiring an engineering firm to assist in the permitting process. An additional \$5,000 was spent on culverts, grass-seed, erosion matting, and labor to bring us into compliance. Furthur, countless payroll dollars were

spent by Inn staff on site visits and mapping the proposed mountain bike trails.
Suicide 6 Downhill Mountain Bike Project.

In the spring of 2017 we began permitting for our lift serve mountain bike project at Suicide 6. In addition to the mountain bike trails this also included a site on the top of the mountain to put a tent for events. This process was pretty straightforward to a point. We had visits from ANR officials to look at proximity to wetlands, deer habitat, and water run-off through intermittent streams. We adjusted location of several sections of trail to smooth the process of getting the permit granted. Where we have run into a huge issue is that the Dept. of Fish and Wildlife has decided to use this opportunity of us applying for a permit to leverage changes to use of Inn property along the Barnard Brook. Suicide 6 as a ski area predates Act 250 by several decades. As a result, there is a significant amount of infrastructure within what now would be a buffer zone on either side of the Brook.

Though our Mountain bike project in no way impacts or comes anywhere near the Brook we are still being held up in the permitting process as we go back and forth with ANR. In addition to an hiring an Engineering firm to prepare our permit and assist with the process, we have now had to hire legal counsel to ensure that we do not lose valuable real estate for both summer and winter operations. To date the permitting process at S6 has cost us just over \$10,000!

I completely understand and agree with the general premise of Act 250. However, it seems prudent to take into consideration what type of project we are looking at when evaluating environmental impacts. A housing complex, shopping mall, etc. have a much different impact than trails in the woods that are well constructed and maintained. Trail based projects should not be subject to the same scrutiny under Act 250 that these larger projects are.

One last consideration is that the success of our trail projects would not be feasible without a significant contribution in man hours from our local VMBA chapter. However, instead of logging volunteer hours on trail building projects many of our members have spent countless hours in local and State permitting hearings voicing their support for our trails. While I greatly appreciate and acknowledge all the support, I would much rather see these people out building new trails or riding their bikes. It is ironic, that in the name of protecting the environment, so much time and money has to be spent on getting permission to build trails that allow people to get into the woods and enjoy nature.

Respectfully,
Nick Mahood
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