

EVIDENCE FOR DEVELOPMENT REVIEW BOARD HEARING JUNE 23, 2026 PROVIDED ON JUNE 16, 2026

Clarity on the scope and intent of the project: At its core, this application is not about introducing a new activity to the property. Recreation already occurs on the property today and has for many years. The question before the Board is whether that existing use should remain informal and unmanaged or whether it should be guided through a thoughtfully planned trail system with stewardship, oversight, signage, maintenance, and environmental safeguards.

Recreational trails are a common and well-established feature of Vermont's landscape and economy, particularly on working forestlands where recreation and forestry have long coexisted. This proposal builds upon that tradition by formalizing existing recreational use while maintaining the property's primary role as a working forest.

The proposed project represents an improvement to existing conditions. By replacing informal and unmanaged use with designated trail corridors and ongoing stewardship, the project provides greater accountability, improved safety, and enhanced protection of natural resources while continuing a long-standing recreational use already occurring on the property.

Following an initial hearing the DRB has requested the following evidence:

A copy of the landowner agreement - This document is attached to this evidence package.

A copy of VMBA's BMP for building trail - This document is attached, and is also available on VT ANR's Department of Forests, Parks and Recreation website [here](#).

A formal parking plan - A fully executed MOU with MAUSD for use of the parking lot at the elementary school is attached.

Stormwater review with a letter confirming outcomes - A letter from the trail designers and builders addressing stormwater is attached.

Emergency Services Coordination

The project team contacted local fire, police, and rescue service providers to inform them of the proposed trail project and provide an opportunity for comment regarding emergency access and response considerations. As of the date of this communication, no comments or concerns have been received. Additional efforts are being made and if we are able to secure comments by the date of the hearing we will bring those forth as evidence.

The proposed trail system is a low-intensity recreational use consisting of natural-surface, non-motorized trails similar to numerous trail networks located throughout Vermont on public, municipal, nonprofit, and privately owned lands. Such trail systems are commonly managed

without dedicated on-site emergency infrastructure and instead rely on established public emergency response procedures.

To support visitor safety, trailhead signage will include:

- The physical 911 emergency address for the property;
- Instructions to call 911 in the event of an emergency;
- Trail maps showing primary access points and trail locations; and
- Emergency contact information, as appropriate.

This approach is consistent with practices currently used at many recreational trail systems throughout Vermont and by local trail organizations, land trusts, municipalities, and outdoor recreation managers.

Given the limited scale of the project, its similarity to existing recreational trail systems throughout Vermont, and the implementation of standard emergency information signage, the Applicant believes the project will not create undue public safety concerns and that emergency response needs can be adequately addressed through existing municipal emergency services.

More information on the anticipated intensity of use

Current Use: A trail counter has been installed on the existing Ledges trail since June 2025. On May 10th, 2026 the following data was collected.

Total users (one way): 5225

Over a roughly one year period this represents current use levels of an average of 436 hikers a month, or 15 people a day. However, actual monthly trends reflect seasonality as to be expected. (January = 180 users; September = 700 users.)

Anticipated future use: VMBA is in the process of completing a comprehensive impact assessment that measures/projects visitors use for all of the trail systems across Vermont. With that data, four types of trail networks were defined: Neighborhood, Community, Regional, and Destination. These categories are largely defined by the amount of trail, using International Mountain Bicycle Association (IMBA) classifications, but are also influenced by factors like proximity to population centers and highways. The table below reflects the actual observed visitor usage for networks of each type, along with the assumptions used for modeling.

The Bristol project is anticipated to be categorized as a 'Community' network type, which IMBA defines as having 6-10 miles of trail in the network. Based on VMBA's data collection and as shown in the table below, it is estimated that a community network would experience 2000-2500 annual visits. Additionally, data from prior studies suggests that 85% of these visitors will be local day users, 10% will be non-local day users, and 5% will be non-local overnight visitors.

ESTIMATED AVERAGE VOLUME BY NETWORK TYPE		
Network Type	Observed visits	Rounded
Neighborhood	624.6	600
Community	2250.7	2000
Regional	7636.5	8000
Destination	15765.5	16000

Conclusion: Based on existing trail counter data and projected use estimates from comparable Vermont trail networks, hiking is expected to remain the primary recreational use of the project. Current use levels demonstrate consistent but moderate visitation, largely driven by local users accessing the area for day recreation. While the proposed trail network may diversify recreational opportunities and attract some additional visitors, available data suggest that overall use will remain characteristic of a community-scale trail network rather than a regional or destination-level attraction. As a result, substantial increases in visitor traffic are not anticipated, and future use is expected to remain within a range that is compatible with the area's existing recreational character and infrastructure.

A formal Act 250 Jurisdictional Opinion

The project team has engaged the ACT 250 District Coordinator for Addison County, Josh Donabedian. A memo summarizing the project was provided to begin the discussion and is also attached as part of the DRB evidence package. Following initial discussions a formal JO application was submitted and is currently being processed. Based on our discussions with Josh we expect the determination to be that no ACT 250 permit is required.

While this is still in process we anticipate that we will have either the formal JO opinion, or an official communication from Josh Donabedian, for the meeting on June 23rd.

Ecological Survey

Efforts were made to evaluate the need for a formal ecological survey; however, a survey was not commissioned because the anticipated environmental benefit of such an assessment is limited given the nature of the project and the existing conditions of the site.

The property is owned by The A. Johnson Company and has been actively managed for timber production for more than 60 years. Forestry remains the primary land use and will continue independent of this project. The proposed trail network does not alter or expand the property's ongoing forest management activities.

In addition, the substantial majority of the proposed trail network follows existing logging roads, informal hiking trails, and other previously disturbed corridors that have been in use for decades. These routes have long supported both forest management operations and public recreational access. As a result, much of the proposed alignment is already cleared, disturbed, and actively used.

The project largely represents the formalization and improvement of existing recreational use rather than the creation of new disturbance. Proposed work will concentrate users within a defined trail corridor, improve drainage, reduce erosion potential, discourage the proliferation of user-created trails, and improve long-term stewardship of the property. The limited areas of newly established trail represent a small footprint relative to the overall property and existing managed forest landscape.

Given the property's long history of active forest management, the predominance of existing disturbed corridors, the limited amount of new disturbance proposed, and the environmental benefits associated with formal trail construction and maintenance, a formal ecological survey is unlikely to materially change project design or environmental outcomes. Furthermore, the cost of such an assessment would be significant relative to the scale of the project and its limited anticipated environmental benefit.

For these reasons, we respectfully request that the DRB reconsider the requirement for a formal ecological survey and instead rely on the findings of the Act 250 Jurisdictional Opinion, which concluded that the project does not warrant further Act 250 review and associated assessments or permitting.

Other attachments:

Letter of support from the Bristol Recreation Department