

Data Submitted (UTC 11): 3/12/2020 12:02:25 PM

First name: Chris

Last name: Campany

Organization: Windham Regional Commission

Title: Executive Director

Comments: Dear Mr. Francomb,

The Windham Regional Commission (WRC) has reviewed the Somerset Integrated Resource Plan (IRP) Environmental Assessment and consulted with Forrest Hammond, Wildlife Biologist and Black Bear Project Leader for the Vermont Fish and Wildlife Department. We have some concerns regarding bear habitat, feeding areas, and movement corridors in some of the proposed activity areas in the Town of Dover and would like to encourage the Green Mountain National Forest to address these further in the final environmental assessment.

In the Somerset IRP Environmental Assessment, the proposed activities of potential concern include new mountain biking, hiking, and cross country ski trails (outlined on page 22 of the Environmental Assessment), and particularly the proposed backcountry recreation area on the east side of Deerfield Ridge (pages 25 & 26). These proposed activities are planned in known important bear habitat areas and are recommended for implementation within or near the Town of Dover Sensitive Wildlife Overlay District. This Wildlife Overlay District is designed to protect important Bear Scarred Beech stand habitat, the Black Bears that rely on those areas for food, and the wildlife corridors connecting these critical habitats to other areas.

In the Windham Regional Plan, adopted on September 30, 2014, recreational opportunities in our region are noted as being very important, but they also need to keep in mind the carrying capacity and protection of natural resources.

\*To maintain and enhance recreational opportunities for both residents and visitors in keeping with the carrying capacity of natural resources and public facilities; (page 6)

\*To maintain and improve the quality of air, water, wildlife, and land resources in the region; (page 6)

The WRC would like to encourage collaboration between the Vermont Agency of Natural Resources (ANR), the Green Mountain National Forest, and the Town of Dover Trails Committee in reviewing the layout of the proposed trails and backcountry recreation/"snow park" off the west side of Handle Road specifically in relation to bear use of that area.

We recommend that the ANR District Wildlife Biologist have the opportunity to walk the proposed trails, either with the trails clearly marked or with a guide, to review the exact layout and make any recommendations the Agency thinks necessary to minimize and/or mitigate potential impacts to critical bear habitat, prior to the layout being finalized.

We would encourage ANR to involve the Dover Trails Committee in this review and walk. We understand that the Dover Trails Committee supports the proposed trails and the recreational value that the area will hold. However, this is an area known to be well used by bear, and the proposed activity should be reviewed by Vermont ANR to lower the risk of bear human interaction, and minimize or mitigate habitat disturbance and avoidance for bears living and traveling in the vicinity.

Thank you for your consideration. If you have any questions or if we can be of further assistance, please reach out to us.

Sincerely,

Chris Campany, Executive Director

Windham Regional Commission