

TOWN OF MIDDLESEX

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January 19, 2024

Department of Forests, Parks and Recreation,
c/o Brad Greenough, Stewardship Forester,
5 Perry Street, Suite 20,
Barre, VT 05641-4265

By Email to ANR.WRMUPublicComment@vermont.gov

Dear Vermont Commissioner of Forest Parks & Recreation,

The Planning Commission of the Town of Middlesex submits the following comments on the Management Plan for State-Owned Lands in the Worcester Range Management Unit. The Planning Commission asks that the Middlesex portion of the Worcester Range be an Ecological Preserve in accordance with Act 59 and the goals of the Vermont Conservation Design.

The Planning Commission is made up of five Middlesex residents elected to serve for staggered three-year terms. As the Town of Middlesex website says, the Planning Commission “is responsible for thinking ahead, with the help of Middlesex residents—for envisioning what we want our town to be like in the future and then helping make that happen.”

The Planning Commission drafts the Town Plan, zoning bylaws, and studies certain issues germane to the future of the Town of Middlesex. As such, the future of the Worcester Range is important to the Planning Commission. We appreciate your careful consideration of these comments and welcome feedback.

Statewide Significance, Context, and State-Owned Land in Middlesex:

The Worcester Range is a defining feature of the Town of Middlesex. It comprises the western boundary of Middlesex, and nearly all the boundary is comprised of State-Owned Land that will be subject to this management plan. Downslope from the State-Owned land is private land, most of which are large lots enrolled in Current Use. Based on the parcel map of Middlesex, nearly one-third of the entire western portion of Middlesex is either State-Owned land or land enrolled in Current Use. For our town

these are natural resource rich lands. As we drive our rural roads, the Worcester Range is never far from sight. As we watch our kids play soccer, attend concerts, or participate at a number of other activities at Rumney Memorial Elementary School, the Worcester Range anchors the experience. Whether one is fishing, hunting, or simply appreciating the variety of wildlife that call Middlesex home, we have the Worcesters to thank for such abundance.

The Planning Commission recognizes the great value and true uniqueness of the Worcester Range and the important role it plays in Middlesex. The Worcester Range is the largest mountain range in Vermont devoid of resort development and bisecting roads. It is also part of a regionally important wildlife linkage between the main spine of the Green Mountains and the Northeastern Highlands (referred to as Worcester to Kingdom Linkage by the Staying Connected Initiative – (<https://stayingconnectedinitiative.org>)). In addition, the Worcester Range contains critical headwaters for the Winooski and Lamoille Rivers, which are major tributaries to Lake Champlain. Finally, the Worcester Range provides vital habitat for a range of wildlife species, including endangered northern long-eared bats and the imperiled Bicknell's Thrush, as well as more common species important to life in Middlesex such as brook trout, black bear, moose and deer.

2023 Town Survey on Natural Resources:

The Middlesex Planning Commission is currently reviewing Wildlife, Conservation, Natural Resources and Recreation planning for our Town. As part of this effort, in 2023, the Middlesex Planning Commission conducted a survey of Middlesex residents to measure what level of importance Townspeople place on these resources. The results are significant to the State of Vermont's planning efforts as it considers the future of the Worcester Range. A robust 122 responses were received. This is significant in a Town with a population of 1779. Relevant responses include:

- **80% of respondents agreed that all undeveloped, larger forested areas in Middlesex are significant and should be protected.**
- **90% of respondents agreed that undeveloped forested areas that connect other larger forested areas are significant and should be protected. The Worcester Range came up as one of the most repeated identified areas in this section of the survey.**
- 75% of respondents agreed that all wetlands in the town of Middlesex are significant and should be identified and protected.
- 85% of respondents agreed that vernal pools are significant and should be identified and protected.
- 90% of respondents agreed that black bear feeding habitat in Middlesex should be protected.

- 85% of respondents agreed that deer wintering areas in Middlesex are significant and should be protected.
- 70% of respondents agreed that **all** ridgeline views in Middlesex are significant and should be protected.

Town Plan:

The Middlesex Town Plan places significant importance on preserving and protecting the valuable natural resources along the Worcester range. It recognizes the importance of preserving the ridgelines for future generations to enjoy, and based on the State’s biofinder resource identifies priority conservation areas to better support wildlife habitat, clean water and climate resilience. Regarding management of public lands, our Town Plan specifically includes:

Objective 12. To maintain the quality and use of existing conserved lands

- Strategy 22. Coordinate with natural resource agencies, organizations and outdoor recreation planners to manage conservation plans for publicly owned lands in Middlesex.

Recommendations:

Based on our Town Plan, the results of the recent survey, and our ongoing planning for wildlife, conservation, natural resources and recreation, it is clear that the protection of natural resources are important to Middlesex residents. The Planning Commission recognizes the value of the Worcester Range to Middlesex residents, Vermonters, and visitors alike.

To better incorporate the needed increased protection of natural resources as part of the Management Plan for State-Owned Lands in the Worcester Range Management Unit, the Middlesex Planning Commission recommends the following:

- **Incorporate Vermont Conservation Design.** The goals of Vermont Conservation Design call for at least nine percent of the State of Vermont to be old forest. As one of the largest tracts of unfragmented forest in Vermont, the Worcester Range offers a prime opportunity to meet Vermont Conservation Design “old forest goals.” Specifically, that old forests should be managed in patches of more than 4,000 acres. Areas of this size in the Worcester Range Management Unit should be managed for old forest.
- **Establish an Ecological Reserve.** The goals of Act 59, include the establishment of Ecological Reserves. There are few places in Vermont that offer

the opportunity to create an Ecological Preserve at such a scale as the Worcester range. An Ecological Reserve can be created by expanding the existing Worcester Range Natural Area. The Act states:

(a) The vision of the State of Vermont is to maintain an ecologically functional landscape that sustains biodiversity, maintains landscape connectivity, supports watershed health, promotes climate resilience, supports working farms and forests, provides opportunities for recreation and appreciation of the natural world, and supports the historic settlement pattern of compact villages surrounded by rural lands and natural areas.

(b) It is the goal of the State that 30 percent of Vermont's total land area shall be conserved by 2030, and 50 percent of the State's total land area shall be conserved by 2050. The Secretary of Natural Resources shall lead the effort in achieving these goals. The land conserved shall include State, federal, municipal, and private land.

(c) Reaching 30 percent by 2030 and 50 percent by 2050 shall include a mix of ecological reserve areas, biodiversity conservation areas, and natural resource management areas. In order to support an ecologically functional and connected landscape with sustainable production of natural resources and recreational opportunities, the approximate percentages of each type of conservation category shall be guided by the principles of conservation science and the conservation targets within Vermont Conservation Design, prioritizing ecological reserve areas to protect highest priority natural communities and maintain or restore old forests.

In short, we ask that the Middlesex portion of the Worcester Range be an Ecological Preserve in accordance with Act 59 and the goals of the Vermont Conservation Design.

The Middlesex Planning Commission

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