

From: seanandlynne@comcast.net [mailto:seanandlynne@comcast.net]

Sent: Tuesday, January 03, 2012 11:27 PM

To: Updates, DCR (DCR)

Cc: michael.rodrigues@masenate.gov

Subject: "Horseneck RMP"

These are my comments about the plan to eliminate the 32 sites at Horseneck Beach Campground. While they may seem long winded, please read the whole email. I read all 108 pages of the Horseneck Planning Unit Public Review Draft. So please give me the same courtesy. I care deeply for this area. I visit all of the Horseneck Reservation year round even though I live 50 minutes away I visit at least weekly in the summer and fall and least once every three weeks to a month in the winter and spring I always treat it like if it was mine because in reality I think it belongs to everyone. It doesn't belong to any one special interest group.

Please Please Please do not eliminate these sites. There is absolutely no reason to eliminate this one of kind camping experience. People have been camping at Horseneck for decades for one main reason and that's to have the opportunity to camp on one of these 32 sites. I personally have been camping here for 18 years. I started tent camping in the sites further back with my wife and two year old daughter and eventually was able to rent a pop up trailer. We then started to camp in the front row. I proceeded to buy a camper and we have camped in the front row ever since. My daughter is now in her 2nd year of college and still wants and comes camping with us each summer. People can't believe when I tell them our daughter still loves to camp with us at Horseneck. Their kids never want to vacation with them. While her reasons for still coming with us vary from escaping the everyday grind to the cherished memories of crabbing, catching stripers from the causeway, to catching and releasing starfish, winning the sand castle contest, or the great card and board games we played. The bottom line is not many teenagers or 20 year olds still want to vacation with their parents.

I have read the draft for the Horseneck planning unit and strongly disagree with eliminating the 32 waterfront sites. We can preserve this area without the elimination of these sites. The idea of the only way to protect it is to keep people away from it is the wrong way to move forward. We should be trying to set an example of how people and environment can co-exist. Lets protect and preserve one of Massachusetts Crown Jewels. With proper signage, education, and enforcement we can truly preserve this area for eternity without the elimination of the 32 waterfront sites.

While there is a lot of data in this report I did not see any examples of dune erosion, dune damage, or beach erosion due to the fact that people have been camping here for over 50 years. I can personally say that I believe there is more dunes and more dune grass than there ever has been. I think the campsites have gotten smaller over the years because of the dunes growing. The old timers who have been coming here much longer than my family say the place looks the same since they've been coming. That includes the bath house too. Everybody seems to agree that the bath house needs a

little upgrading. At least fix the latch on the shower door in the men's room. It's been broken for more than 10 years.

I think the campground should be expanded and some improvements made. The idea of having a camp store is great. There is one at Salisbury beach and it's great to be able to buy ice and necessities right at the campground. I also think there should be an expansion of the programs offered at the beach and campground. These should be posted on the website and update throughout the season by park staff. There could even be a link on Reserve America showing what the programs will be. I know you will agree with this, but say that takes funding. Not necessarily. These should be internships or summer programs for college students that are entering these fields. This might seem weird, but I do not see the need to electrify all the sites. I think the money could be better used for other improvements unless it is a inexpensive improvement.

It was not easy to comment on this issue. I literally found out about the public hearing that was on December 5th the afternoon of the 5th only because I subscribe to everythingWestport.com. They sent me an email update and it was on the front page. I bring this up because if more people knew about these plans you would get a lot more public input in favor of not eliminating these 32 sites.

Thank you for taking the time to read my comments. I appreciate your efforts to protect and preserve this jewel. I just think there is a better way than eliminating these sites.

Sincerely,

Sean Perry
779 Oakhill Ave.
Attleboro, MA. 02703

As members of the Massachusetts Beach Buggy Association for over 20 years, we take beach conservation and public access very seriously. We have been installing the winter snow fence across the main beach at Horseneck every fall for several years, and in the spring and fall we do several conservation and cleanup projects at the National Seashore beaches and DCR beaches which include Salisbury and Scusset State Parks. This is all done through the volunteer efforts of our concerned members. So we are fully aware of the importance of beach conservation and the protection of the dunes.

This comment is directed at the redesign of the campground which includes removal of the 32 waterfront sites. This proposal was brought up in 2008 which was received with huge opposition. On page 13 of the plan, the picture and perception that the displayed vehicle parked on the "primary dune" is misleading and deceptive. The area is hard packed gravel to the right of an asphalt paved campsite. The dune area which consists of predominately rock is subject to normal high tides and winds that naturally wash any sand away leaving behind the heavier rocks. The perception that a dune could naturally form here is borne out by the natural effects of wind and tides. The man power efforts required to maintain sand on the public beach should be clear proof that this area is already being used for its highest and best use. Clearly the science proving otherwise is nonexistent. As an example, has anyone studied the possible effect of the removal of the asphalt and concrete to return the area to a more natural state and the potential further encroachment of the ocean? Is the plan to manually replace the sand here year after year as the ocean washes it away? Or is it more likely that the areas would be abandoned allowing the ocean to further encroach on the other areas of the campground? Clearly the ocean front campsites are a bigger benefit to maintaining this ocean front area than their removal. And may we add that the rangers do not enforce the limit of cars per site or control where people park their vehicles.

Another issue is the revenue gained by the rental of these sites. In a cash strapped economy where the park system is already short changed the money needed to properly maintain and staff the parks what sense does it make to remove the most popular campsites for a dubious gain at best? Being the main attraction, these 32 waterfront sites are always booked from May to October bringing significant revenue to the state park system as well as bringing enormous enjoyment to hundreds and perhaps thousands of people for over 40 years.

There is also a misunderstanding that all campers in the park do not have access to the waterfront. This is not true, as there are several paths between the waterfront campsites that are used by all campers at Horseneck. Your plan of installing boardwalks for the handicap on these paths would be an excellent addition.

Every year more and more coastal areas in Massachusetts are being closed due to the endangered piping plovers or land being sold to private parties. The average family has less and less beachfront access to enjoy. So many people look forward to their "little piece of heaven" every year, and would be heartbroken to lose it. It has been said that if the Horseneck campground were to be built today, it would not be built with waterfront sites. It is not being built today, these sites have been here for over 40 years just as thousands of houses all up and down the coast that are on the ocean. These waterfront campsites are doing no harm to the dunes and we are requesting that you abandon your plan to redesign the campground and keep these waterfront sites that mean so much to so many people.

Sincerely,

Suzanne Kelly, Director for Mass Beach Buggy Assoc and Horseneck Assistant Beach Rep

Robert Kelly, Horseneck Courtesy Patrol for Mass Beach Buggy Assoc.

98 Central Street, So. Easton, MA 02375

From: Jamie Bogart [<mailto:jbogart@lloydcenter.org>]
Sent: Thursday, January 05, 2012 4:37 PM
To: Updates, DCR (DCR)
Cc: Mark Mello
Subject: Horseneck RMP

Some thoughts relative to Lloyd Center work on rare species:

a)Gooseberry

include this site relative to dog use considerations, as modest(1-2 pairs) numbers of breeding pairs of plovers use the south tip annually, and loose dogs can disrupt the shorebird breeding process.

b)Horseneck

- for Piping Plovers, ensure the main beach "recreation area" is recognized as the critical nesting plover habitat that it also is. Prompt storm fencing removal and beach prep in early April is critical to allow nesting to proceed unimpeded in Spring, before beach crowds arrive. Prompt beach prep decreases chance that pairs wanting to nest there will instead choose paved areas beyond the access road. Raking and general vehicle use should continue to be a consideration relative to the presence of birds through August, when young may be present anywhere on the beach.

c)Demarest Lloyd

In addition to recognizing the growing importance of the north spit that is almost entirely a shorebird refuge and nesting area for the diamondback terrapins, consider potential public use impacts over the rest of the park. The reason is the diamondback terrapins which also emerge from Giles Creek and may nest in the picnic areas, and cross the large parking area. All during high use hours. So the importance of this species relative to park management (e.g. vehicles) and human use (e.g. picnickers attempt to handle nesting turtles) throughout the entire park should be considered in planning.

Jamie Bogart
Lloyd Center

From: charlesmotta@cs.com [mailto:charlesmotta@cs.com]

Sent: Friday, January 06, 2012 5:45 PM

To: Updates, DCR (DCR)

Subject: HORSENECK PLANNING UNIT "Horseneck RMP"

The Horseneck Reservation in Westport Massachusetts is along Buzzard Bay and has the potential of being a world-class entertainment site along the Southeastern Massachusetts coast. Combined with being one of the best salt water beaches in Massachusetts it could also be used to bring people to the southcoast to enjoy all the attractions of the area in SE Massachusetts.

The nearest tent theatres are located in Cape Cod and are the Music Circus and Melody Tents that are owned and operated by the South Shore Playhouse Associates. I feel that with the permission of the DRC, this site could also be one of the most attractive entertainment locations in Massachusetts. The summer theatre tent event has emerged as a popular destinations for patrons and performers alike, providing a relaxed ambiance and intimate theatre experience where every seat is within 50 feet of the stage.

To establish this as an entertainment site would not require a great deal of money to build since Horseneck has parking, an interstate highway system direct to the parking lots, first aid and food sites, natural cooling during the summer months from the Buzzards Bay waters, no neighbors to object to any noise and a source of a work force that is made up of college student that could work to support them self and help fund their schools.

Some of the touring performers of world-class caliber that could including Tony Bennett, Linda Ronstadt, Bill Cosby, the Irish Tenors, Vince Gill, the Moody Blues, Crosby Stills Nash, Carole King, Melissa Etheridge, Wynonna, Bruce Hornsby, Johnny Mathis, Kenny Rogers, B.B. King, Fuel, Alison Krauss and Union Station, Lynyrd Skynyrd, Jo Dee Messina, Alice Cooper, Willie Nelson, Hall & Oates, Chris Isaak, Hootie & the Blowfish, Blues Traveler, the Doobie Brothers, Joe Cocker, John Hiatt, Robert Cray, Lyle Lovett, Huey Lewis, the Beach Boys, KC & the Sunshine Band, the Indigo Girls, Ani DiFranco, Aimee Mann, Aretha Franklin, Little Feat, the Doobie Brothers, George Thorogood, Jonny Lang, Lisa Marie Presley, Hanson, Linda Eder, the Gipsy Kings and the Boston Pops.

I will contact you personally and look forward to making this site locate at Horsneck.

Charles Motta



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

January 6, 2012

Edward M. Lambert, Jr.
Commissioner
Massachusetts Department of Conservation and Recreation
251 Causeway Street, Suite 900
Boston, MA 02114

RECEIVED

JAN 06 2012

Per _____

RE: Horseneck Planning Unit Resource Management Plan Recommendations

Dear Commissioner Lambert:

Thank you for the opportunity to review Massachusetts Department of Conservation and Recreation's (DCR) Horseneck Planning Unit Resource Management Plan (RMP), dated December 2011. CZM wishes to commend DCR on the development of the RMP for both the Horseneck Beach State Reservation and the Demarest Lloyd Memorial State Park, which together make up the Horseneck Planning Unit. RMPs allow the collection of existing information on natural resources, facility infrastructure and use, the identification of management issues and opportunities, and the selection of planning strategies and recommendations for the most effective facility management.

The Current RMP identifies 100 management recommendations for the two facilities, 30 of which DCR identifies as high priority. In the RMP, DCR believes it will have the necessary resources to implement 13 of the high priority recommendation and an additional 13 lower priority recommendations over the five year implementation time frame for the RMP. The RMP indicates that DCR will be seeking input from CZM on various issues, and we look forward to providing technical assistance to DCR particularly on beach management and natural resource issues. Future collaboration will reinforce the cooperative working relationship CZM and DCR have enjoyed on site improvements and management issues at the facilities over the years. The following are CZM recommendations for the Horseneck Planning Unit RMP.

A balanced approach between natural resource protection and public enjoyment of those same natural resources is key to the long-term management of the facilities. With this in mind CZM is supportive of DCR's overall management principle to: *"Achieve a sustainable balance between the conservation of important coastal resources in a dynamic ecosystem, with the provision of recreational opportunities for all."*

Given the dynamic nature of barrier beach systems, the impacts of climate change may be difficult to identify over the five-year time frame of the current RMP. However, CZM believe that over the long-term, climate change will likely have profound impacts on the barrier beach systems of Horseneck Beach State Reservation and Demarest Lloyd Memorial State Park. With this in mind, CZM recommends that the current RMP include a more robust discussion of the potential long-term climate change impacts on the two facilities. The discussion should include impacts of past sea-level rise as well as various projections of future sea-level rise under different scenarios. Ideally some visual representations of these potential impacts would also be beneficial. The climate change discussion should also include projections on how increased storm frequency and intensity may

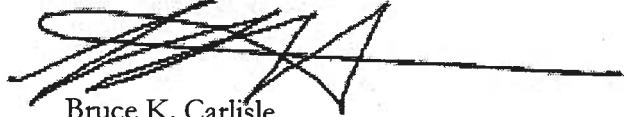
DEVAL L. PATRICK GOVERNOR TIMOTHY P. MURRAY LIEUTENANT GOVERNOR RICHARD K. SULLIVAN JR. SECRETARY BRUCE K. CARLISLE DIRECTOR

www.mass.gov/czm



preparation of this RMP for the Horseneck Planning Unit, and looks forward to working with DCR on implementation of it's RMP.

Sincerely,

A handwritten signature in black ink, appearing to be "Bruce K. Carlisle", written over a horizontal line.

Bruce K. Carlisle
Director

BKC/dsj/rh/rlb/jk



Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

January 6, 2012

Horseneck RMP Comments
P.O. Box 66
194 Cranberry Road
South Carver, MA 02366

RE: Draft *Horseneck Planning Unit Resource Management Plan*

Dear Mr. Cavanagh:

The Massachusetts Natural Heritage & Endangered Species Program (NHESP) is pleased to offer comments on the December, 2011, draft of the *Horseneck Planning Unit Resource Management Plan*. In general, we support the Resource Management Plan as written, excepting a few concerns. Our concerns are noted below, by page number of the draft.

Page 17: Fish

In the second paragraph of this section is the statement, "A list of 39 fish species taken or reported from the Westport River prior to 1970, including the state Threatened threespine stickleback, can be found...". Only the trimorphic freshwater population of the Threespine Stickleback (*Gasterosteus aculeatus*) is listed and protected under the Massachusetts Endangered Species Act (MESA). Threespine Sticklebacks are common inhabitants of the saltwater along Massachusetts's coast, but the trimorphic freshwater population is documented only from the City of Boston.

Pages 20-21: Horseneck Beach Rare Species and Table 2.3.1

Currently, Natural Heritage has documented habitat of the following MESA-listed rare species at Horseneck Beach State Reservation:

- Chain Dot Geometer (*Cingilia catenaria*, Special Concern)
- Least Tern (*Sternula antillarum*, Special Concern)
- Piping Plover (*Charadrius melodus*, Threatened, federally Threatened)
- Spartina Borer Moth (*Spartiniphaga inops*, Special Concern)

In addition, Roseate Terns (*Sterna dougallii*, Endangered, federally Endangered), Arctic Terns (*Sterna paradisaea*, Special Concern), and Common Terns (*Sterna hirundo*, Special Concern) forage along the ocean side.

Pinnate Water-milfoil (*Myriophyllum pinnatum*, Special Concern) has been documented from the Reservation in the past, but the last observation at the property was in 1983 and NHESP now considered this population to be Historic.

www.nhesp.org



Natural Heritage & Endangered Species Program

North Drive, Route 135, Westborough, MA 01581 Tel: (508) 389-6360 Fax: (508) 389-7891

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The data-sensitive rare insect referred to in Table 2.3.1 also used to occur at the Reservation. However, NHESP now considers this population to be extirpated from the property and its vicinity.

NHESP has no current or historic documented records of Arethusa (*Arethusa bulbosa*, Threatened), Diamond-backed Terrapin (*Malaclemys terrapin*, Threatened), Eastern Box Turtle (*Terrapene carolina*, Special Concern), New England Blazing Star (*Liatris scariosa* var. *novae-angliae*, Special Concern), or Northern Gama-grass (*Tripsacum dactyloides*, Endangered) on the Reservation. Note that Table 2.3.1 states that Eastern Box Turtle and New England Blazing Star are confirmed as occurring on the Reservation, although NHESP has no data supporting such confirmations. If DCR has data supporting observations of these species (or any other MESA-listed species) on the property, NHESP would appreciate receiving the information.

The draft RMP notes that nine additional state-listed birds have been observed by birders at Horseneck Beach. These species are not included in the NHESP database because NHESP does not track migration of state-listed birds, only breeding records (and sometimes over-wintering sites). If any of the observations of these nine birds include breeding records, NHESP would appreciate receiving that information.

We note that the draft RMP appears to rely on citizen reports of rare shorebird nesting success or failure (e.g., Bogart *et al.* 2010); NHESP is happy to share such data with DCR, with appropriate data release agreements.

Pages 21-22: Horseneck Beach Natural Communities and Table 2.3.2

The NHESP database currently has documentation of Maritime Beach Strand and Maritime Oak-Holly Forest natural communities at Horseneck Beach. However, it is likely that the other types of natural communities (Gravel/Sand Beach, Maritime Dune, Maritime Shrubland, Salt Marsh) listed in Table 2.3.2 occur at the Reservation; NHESP would appreciate receiving data on these occurrences, especially the S2 and S3 communities.

Pages 36-37: Demarest Lloyd Rare Species

Currently, Natural Heritage has documented habitat of the following MESA-listed rare species at Demarest Lloyd Memorial State Park:

- Arctic Tern (*Sterna paradisaea*, Special Concern) – foraging only
- Bristly Foxtail (*Setaria parviflora*, Special Concern)
- Chain Dot Geometer (*Cingilia catenaria*, Special Concern)
- Common Tern (*Sterna hirundo*, Special Concern) – breeding and foraging
- Diamond-backed Terrapin (*Malaclemys terrapin*, Threatened)
- Least Tern (*Sternula antillarum*, Special Concern) – breeding and foraging
- Marbled Salamander (*Ambystoma opacum*, Threatened)
- Piping Plover (*Charadrius melodus*, Threatened, federally Threatened)
- Roseate Tern (*Sterna dougallii*, Endangered, federally Endangered) – foraging only
- Sea Pink (*Sabatia stellaris*, Endangered) – note that this population has not been re-observed on several recent searches
- Spartina Borer Moth (*Spartiniphaga inops*, Special Concern)
- Straight Lined Mallow Moth (*Bagisara rectifascia*, Special Concern) – note that this species has been proposed for de-listing
- Data-sensitive rare plant (Name not released, Endangered) – last observed 2001

NHESP has no current or historic documented records of Attenuated Bluet (*Enallagma daeckii*, Special Concern), Drunk Apamea Moth (*Apamea inebriata*, Special Concern), Dune Noctuid Moth (*Oncocnemis riparia*, Special Concern), Eastern Spadefoot (*Scaphiopus holbrookii*, Threatened), Pale Green Pinion Moth (*Lithophane viridipallens*, Special Concern), Pink Sallow Moth (*Psectraglaea carnosae*, Special Concern), Waxed Sallow Moth (*Chaetoglaea cerata*, Special Concern) or a Threatened data-sensitive rare plant on the State Park. Note that Table 2.4.1 states that Drunk Apamea Moth, Waxed Sallow Moth, and a Threatened data-sensitive rare plant are confirmed as occurring on the park, although NHESP has no data supporting such confirmations. If DCR has data supporting observations of these species (or any other MESA-listed Species) on the property, NHESP would appreciate receiving the information.

The draft RMP notes that five additional state-listed birds have been observed by birders at Demarest Lloyd. These species are not included in the NHESP database because NHESP does not track migration of state-listed birds, only breeding records (and sometimes over-wintering sites). If any of the observations of these five birds include breeding records, NHESP would appreciate receiving that information.

We note that the draft RMP appears to rely on citizen reports of rare shorebird nesting success or failure (e.g., Bogart *et al.* 2010); NHESP is happy to share such data with DCR, with appropriate data release agreements.

Pages 37-38: Demarest Lloyd Natural Communities and Table 2.4.2

The NHESP database currently has documentation of Coastal Forest/Woodland, Coastal Interdunal Marsh Swale, Estuarine Intertidal: Coastal Salt Pond Marsh, Maritime Dune, Maritime Oak-Holly Forest, and Maritime Shrubland natural communities at Demarest Lloyd. Note that the Estuarine Intertidal: Coastal Salt Pond Marsh community type is not listed in Table 2.4.2; this community type is ranked S2.

Page 65: Recommended Land Stewardship Zoning for Horseneck Beach and Demarest Lloyd

NHESP agrees with the recommended zoning for Horseneck Beach and Demarest Lloyd as stated in the draft RMP.

Pages 69-76: Management Recommendations, Tables 4.3.1, 4.3.2, and 4.3.3

NHESP agrees with the recommendations outlined in these three tables and with the prioritization of them. NHESP looks forward to coordinating with DCR on the implementation of the recommendations.

Page 90: Table G1

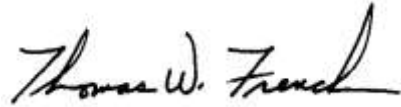
Because NHESP GIS datalayers such as Priority Habitat of Rare Species and Estimated Habitat of Rare Wildlife change from time to time, DCR may wish to include the date of the NHESP layers. Also, note that the BioMap Core Habitat and Supporting Natural Landscape datalayers have been superseded by the BioMap2 Core Habitat and Critical Natural Landscape datalayers, as of February, 2011.

Page 92: Table H.1

The MESA status of *Sabatia stellaris* (Sea Pink) is E, Endangered; *Myriophyllum pinnatum* (Pinnate Water-milfoil) is SC, Special Concern.

Thank you for allowing NHESP the opportunity to comment on the draft Resource Management Plan. If you have any questions regarding our comments, please contact Lynn Harper, Habitat Protection Specialist, in our Westborough office at 508-389-6351.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. French". The signature is written in a cursive style with a large, prominent initial 'T'.

Thomas W. French, Ph.D.
Assistant Director
Natural Heritage &
Endangered Species Program

From: elaine ostroff.org [<mailto:elaine@ostroff.org>]
Sent: Friday, January 06, 2012 8:59 PM
To: Comments, RMP (DCR); Updates, DCR (DCR)
Cc: Michael P. Sullivan (MPSWEST@Gmail.com)
Subject: Horseneck RMP

Thanks for the chance to comment on your comprehensive Draft Resource Management Plan.

We are writing on behalf of Westport Business to Business, an association of over 100 businesses in the Westport area. The Board of Directors voted at our meeting on January 3, 2012 to express our strong concern about the proposed relocation of 32 campsites at Horseneck State Beach. We understand that you need to protect the barrier beach and urge that you do so around the existing sites.

As residents and businesses in the area, we are graced with the resources of this magnificent beach. The campground provides a rare and economical way that many families can experience the ocean. Please go forward with doing all that is needed to protect and restore the dunes but please leave these precious campsites intact.

Thank you for your consideration of our concerns.

Michael P. Sullivan, President
Westport Business to Business

Elaine Ostroff
Member, Board of Directors
Westport Business to Business

From: elaine ostroff.org [<mailto:elaine@ostroff.org>]
Sent: Friday, January 06, 2012 8:57 PM
To: Comments, RMP (DCR); Updates, DCR (DCR)
Subject: Horseneck RMP

Thanks for the opportunity to comment on the extensive & thoughtful Resource Management Plan.

As a Westport resident over 65 I am one of the lucky people who have the free pass to Horseneck and all the state beaches. We are so lucky to have Horseneck in our back yard.

Thank you for the extraordinary improvements that you've already made to Horseneck, especially the recent buildings and the fabulous boardwalk. The environmentally sensitive improvements, including the composting toilets, add to the positive experience while minimizing impact on the environment. The remarkable shaded and accessible boardwalk allow people with mobility limitations to get much closer to the beach.

It was helpful to read the RMP summary, the narrative and see the charts. I have comments about Goal 1 and Goal 2.

Goal 1: I appreciate your process and ongoing intent to protect and enhance the barrier beach geology and ecology. **However, I hope that you can find a way to make some redesign of the Campground and dune protection without relocating the 32 campsites from the primary dune.** These campsites provide a rare opportunity for families to enjoy the ocean beach. Especially now, in this economic downturn, it feels unfair to eliminate that unique beachfront experience.

Goal 2: I also value the way you plan to maintain and enhance sustainable recreational opportunities. You state that you will "Provide greater ADA accessibility to the water." You propose making the 5 beach wheelchairs more visible by "delivering them to the contact station each morning..."

I offer some additional suggestions: the availability of the beach wheelchairs needs much more promotion so people know that they are available and the process to get them - before they come to the beach. People may not know that they exist. Signs at the beach entrance with a visible phone number will help. Press releases to the area newspapers will help. More details on your website are needed. The Universal Access brochure provides a phone number, but that fine brochure needs much wider distribution.

However, the beach wheelchairs do not provide independent access to the water. **Please consider the Mobi mats used at Salisbury State park as a way to cross the sand and get closer to the water. There should be a trail of Mobi mats from the end of the wheelchair ramp across the sand.** As of now, the wheelchair user gets to the end of the ramp and cannot go any further.

Attached are 2 photos from Salisbury Beach.

Elaine Ostroff, Chair
Westport Commission on Disability





January 6, 2012

Commissioner Edward M. Lambert, Jr.
Department of Conservation and Recreation
100 Cambridge Street, Suite 900
Boston, MA 02114

Via e-mail: DCR.Updates@state.ma.us

Re: Horseneck Planning Unit Resource Management Plan (RMP)

Dear Commissioner Lambert:

On behalf of Mass Audubon I offer the following comments on the Draft Resource Management Plan (RMP) for Horseneck Planning Unit (HPU) which includes Horseneck Beach State Reservation (HBCH) and Demarest Lloyd Memorial State Park (DEML). These properties contain significant, sensitive natural resources and are also important public recreational destinations. Mass Audubon appreciates the Department of Conservation and Recreation (DCR) prioritizing this RMP within the large number of such plans it is developing. The draft RMP contains substantial information about the properties and associated resources, uses, existing management practices, and management challenges. The goals in the draft plan are strong and appropriate. While this is a good draft document, we note that the draft Beach Management Plan that is a key aspect of land management for this planning unit is not included, nor is there a rare species management plan¹ that has been prepared with the input and approval of the Natural Heritage and Endangered Species Program (NHESP). Clarification of some of the recommendations would also be helpful. Therefore, Mass Audubon requests that DCR prepare a revised draft RMP and re-circulate that document for public comment prior to issuance of a final RMP.

Overview

As stated in the Executive Summary, both HBCH and DEML are fragile in nature, “continually being reshaped by coastal forces, including wind, waves and currents.” The 500-acre HBCH in Westport is the largest barrier beach system on the south coast of Massachusetts, lying seaward of the mouth of the Westport River with four miles of ocean shoreline. Seventy eight percent of the Reservation is designated as Priority Habitat for state-listed species by the NHESP. The 220-acre DEML is located in Dartmouth on a barrier spit at the mouth of the Slocum’s River.

¹ Management plans for state lands that are Priority Habitat for state-listed rare species must meet certain standards and be reviewed by NHESP according to the Massachusetts Endangered Species Act (MESA) regulations at 321 CMR 10.05 http://www.mass.gov/dfwele/dfw/nhesp/regulatory_review/mesa/mesa_home.htm.

Ninety-one percent of the Park is designated as Priority Habitat. The HPU also includes four parcels of land abutting HBCH totaling 459 acres that lie within Mass Audubon's Allens Pond Wildlife Sanctuary on which DCR holds Conservation Restrictions. The agency holds an Agricultural Restriction on 88 acres, 70 of which are among the 459 above and 18 of which are contiguous and owned by an adjacent private owner. Both the HBCH and the Sanctuary provide critical nesting habitat for Piping Plovers (listed as Threatened under both federal and state endangered species laws) and attract many other species of migrating and nesting birds. Allens Pond and the Westport River watershed are designated "Important Bird Areas" by Mass Audubon, and the organization's Coastal Waterbird Program provides stewardship and monitoring efforts at nesting and staging sites for the Piping Plover and Roseate Tern (federal and state Endangered) and nesting sites for the Least Tern (a state Species of Special Concern). The RMP acknowledges that the HBCH and DEML are further threatened by potential impacts of climate change, including an expected sea level rise of 1.5 feet projected over the next 100 years and increased frequency and intensity of storms.

The properties in the HPU also serve as popular public recreation areas. As the draft RMP states, the HBCH is one of the most highly visited ocean beach facilities in the DCR system, serving a population of the south coast that includes significant percentages of non-English speaking and low-income families. The draft RMP identifies DCR's Management Principle for the HPU: "Achieve a sustainable balance between the conservation of important coastal resources in a dynamic ecosystem with the provision of recreational opportunities for all." While we generally support this principle, we note that existing conditions in the HPU do not currently meet the standard of a "sustainable balance." Furthermore, we note that the required standard in the MESA regulations is that where conflicts exist between recreation and rare species protection on state lands, All practicable means and measures shall be taken to resolve conflicts between the protection, conservation, and restoration of state listed species on state owned lands and other uses of such lands in favor of the listed species (321 CMR 10.05).

We recognize that DCR faces a substantial challenge with limited financial resources to implement this principle, but concur with DCR's statement that opportunities for outdoor recreation provided by DCR facilities are due to the wealth of natural and cultural resources. Considering the ecological significance of these DCR properties, we urge you to adopt a RMP that provides public recreational use in sustainable ways that ensure the future protection and viability of the natural communities of these valuable properties.

Mass Audubon supports the four Goals identified in the draft RMP and many of the recommendations for priority actions. We commend DCR for its good work in preparing a document that includes a large amount of valuable information about the HPU and the agency's future plans. As described in detail later in this letter, the draft RMP lacks critical information and assessment that is necessary to determine what management strategies are needed to ensure that the current problems are addressed to ensure the future protection and viability of the important natural resources of these properties. For this reason we request that a revised draft RMP be prepared and circulated for public review and comment before the final RMP is adopted.

Background

Natural resources: Both HBCH and DEML support unusual natural communities and populations of state-listed species. Of the six natural communities of HBCH (listed on p. 22 of the draft RMP), Maritime Oak-Holly Forest is ranked as S1 (most rare) and Maritime Dune as S2. Six state-listed species are known to occur; five others may occur and need confirmation. HBCH also includes an 81.5-acre barrier island, Gooseberry Neck. The natural communities of DEML include two ranked as S1: a Coastal Interdunal Marsh Swale and Maritime Oak-Holly Forest, as well as Maritime Dune (S2) and rich estuarine marsh habitat along the Slocum River. DEML supports fifteen state-listed species of birds, reptiles and plants, two of which are Legacy Species requiring habitat that occurs either entirely or mostly on DCR properties. Two other state-listed species may occur and need confirmation.

Current and Future Management Issues

The draft RMP identifies a number of problems and issues related to current conditions of natural resources in the HPU. These include but are not limited to:

- Disturbance of nesting shore birds: Human disturbance, wild predators, dogs and use of Off-Highway Vehicles for maintenance negatively impact reproductive success of rare beach nesting birds at HBCH, especially on Gooseberry Neck and on northern spit of DEML. Occasionally Piping Plovers nest in the back dunes of HBCH adjacent to parking lots creating conflicts with human and vehicular traffic. A “data sensitive rare insect” found at HBCH is also vulnerable to disturbance by pedestrians and vehicles.
- Invasive species: More than five species of invasive plants in HBCH and six at DEML threaten the survival of native plant populations and need control.
- Salt ponds on Gooseberry Neck: The ponds are degraded. The draft RMP states that restoration by vegetation removal such as controlled burns would reestablish habitat for fire-dependent rare invertebrates and for coastal, migrating or wintering birds.
- Vernal pools need to be given a level of protection, as well as nearby burrowing habitat for Eastern spadefoot toads (state-listed as Threatened).
- John Reed Road: This road bisects the HBCH ecosystem. Two culverts are in poor condition and restrict hydraulic flow. Replacement culverts could be designed to facilitate natural movement of wildlife.
- Stormwater management: The 2009 Stormwater Runoff Improvement Project Design for HBCH which includes linear rain gardens with natural plantings has not been implemented because of lack of funding. Planned removal of some impervious surfaces has not been completed.
- Historic leveling of dunes: The draft RMP states that the leveling of primary and secondary dunes to construct campsites along with the ongoing use of the area has caused damage that “has taken a significant toll on the natural barrier beach ecosystem including dune growth and migration. Dune removal also eliminated an important sand source for beach nourishment accelerating beach erosion.” The draft RMP also states that uncontrolled foot traffic over the remaining dune and parking of boat trailers, kayaks and bikes on dune vegetation further contributes to erosion of the dune system and compromises wildlife habitat, and that the current location of the 32 campsites makes

them vulnerable to storm damage and exposes the rest of the campground to increased risk from storms (p. 27-28).

In addition to the issues above, several attendees of DCR's public meeting on December 7, 2011 commented on substantial beach erosion they had observed in recent years. This erosion may be the result of natural processes. Impacts of climate change may exacerbate the loss of beach.

Detailed comments

As stated above we request that DCR prepare a revised draft RMP and circulate it for public review and comment prior to adoption of the final RMP for this Planning Unit to address the following issues and concerns.

1. The draft RMP states on page 9 that an updated Barrier Beach Management Plan was developed by DCR in 2007. The RMP also refers to a 2009 Order of Conditions issued to DCR by the Westport Conservation Commission for operational maintenance and proposes (as a Goal 1 Priority Action) to "combine the 2009 Order of Conditions...with the Barrier Beach Management Plan and obtain state and municipal agency approval by 2012." The revised draft RMP should include both of these documents in the Appendices. If DCR seeks an extension of the 2009 Order, the renewed Order should be based on the revised Barrier Beach Management Plan.

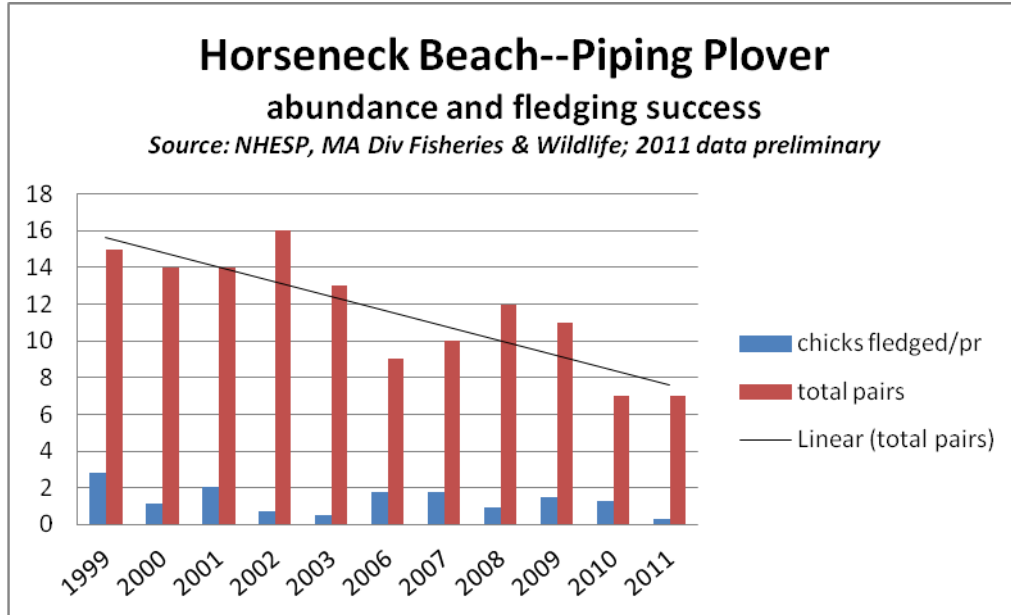
The revised draft RMP should demonstrate that current management of the HPU and Priority Actions recommended by DCR comply with the Commonwealth's Barrier Beach Guidelines.

2. DCR should assess the entire Planning Unit for the presence of state-listed species and include additional information in the revised draft RMP. An occurrence of Eastern Spadefoot Toad (*Scaphiopus holbrookii*) was reported to NHESP in spring of 2011. This information and any other data submitted to NHESP since the finalization of the 2010 Priority Habitat maps should be considered in the RMP. DCR should also assess all potential vernal pools identified within the HPU and proceed with certification for pools that meet NHESP's criteria. Until this assessment is complete, DCR should treat all potential vernal pools as certified.

3. The RMP should include a plan for management of rare species habitat in the HPU that has been reviewed and approved by NHESP. Regarding activities of state agencies in Priority Habitat, the MESA regulations require that if there is a conflict between proposed activity and rare species protection, the agency must resolve the conflict in favor of the listed species. The rare species management plan for HPU should demonstrate compliance with this requirement.

4. We are especially concerned about the status of abundance and fledging success of the Piping Plover (*Charadrius melodus*), the loss of nesting habitat on Horseneck Beach and the need to provide increased protection for nesting plovers. The graph in Figure 1 shows declining numbers of piping plover pairs nesting on Horseneck Beach from 1999 to 2011 using summary data from NHESP (Figure 1).

Figure 1



The decline in nesting pairs suggests that suitable habitat for nesting is less available, and new pairs may have limited areas to prospect for nesting sites. We note that numbers of nesting plovers in other areas along Buzzards Bay have been stable or increasing. Although potential habitat for plovers may be lost due to natural processes, it is also likely that the year-round human activity on the beach also degrades the habitat.

The revised draft RMP should address ways to maximize the amount of suitable nesting habitat on Horseneck Beach, recognizing that options for restoring habitat (such as beach nourishment) must be balanced against the need to maintain the integrity of a dynamic barrier beach. It should also address ways to increase protection for nesting plovers, evaluating DCR’s capacity to enforce existing restrictions and considering more aggressive efforts to reduce human intrusion into plover nesting areas and establishment of more “exclusion zones.” Finally, in light of the fact that more people are coming to Horseneck Beach, many of whom are not fully aware of how human behavior can increase threats to the plovers’ survival, DCR should expand its efforts on plover outreach and education. We would support proposals from the Lloyd Center for grant funding to assist with new outreach and education initiatives.

Table 1: NHESP Summary Data for Piping Plover on Horseneck Beach, 1999-2011

				index	total	y fledge	pr w data	y fledge/pr
1999	Bristol County	Horseneck Beach	Westport	15	15	42	15	2.80
2000	Bristol County	Horseneck Beach	Westport	14	14	16	14	1.14

2001	Bristol County	Horseneck Beach	Westport	13	14	29	14	2.07
2002	Bristol County	Horseneck Beach	Westport	16	16	11	16	0.69
2003	Bristol County	Horseneck Beach	Westport	13	13	7	13	0.54
2006	Bristol County	Horseneck Beach	Westport	9	9	16	9	1.78
2007	Bristol County	Horseneck Beach	Westport	10	10	18	10	1.80
2008	Bristol County	Horseneck Beach	Westport	12	12	11	12	0.92
2009	Bristol County	Horseneck Beach	Westport	11	11	16	11	1.45
2010	Bristol County	Horseneck Beach State Reservation	Westport	7	7	9	7	1.29
2011	Bristol County	Horseneck Beach State Reservation	Westport		7	2		0.29

5. Restoration of degraded marshes and ponds. We support DCR’s proposal (Priority Action under Goal 3 for HBCH) to prepare an eradication plan to address the common reed invasion into the former salt ponds on Gooseberry Neck. We would support a prescribed burn in these areas and in other areas of the Planning Unit as one tool in eliminating phragmites and restoring valuable habitat.

6. Campground at Horseneck Beach. DCR recommends (Priority Action under Goal 1): “Redesign the campground to enhance both the visitor experience and the function of the barrier beach system.” We recognize that some activities associated with campground use result in erosion and dune damage and support this recommendation, implemented through a public process. The process should include a detailed ecological inventory of possible relocation sites for the 32 waterfront campsites to determine whether sensitive natural resources would be impacted and explore creative and innovative alternatives for campground redesign that would accomplish the objectives DCR has identified. It should also address the oversight and funding that a relocation would require and provide assurance that resources to support the ongoing management needs will be available. The redesign plan should be adopted through a public process as an amendment to the RMP.

7. Table 3.2.2 on p. 52, “Current management activities in the Horseneck Planning Unit” refers to sand fence installation for dune protection in the Planning Unit “as needed” and on Horseneck Beach, “winter.” The revised draft RMP should clarify the locations, seasonality, type and purpose of all fence installation. It should take into account the guidance relating to snowfencing and other beach stabilizations in the “Atlantic Coast Piping Plover Recovery Plan” of the US Fish and Wildlife Service (p. 67, provided below) and demonstrate that none of the fencing will disrupt the beach dynamics that optimize plover habitat.

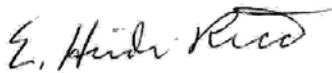
1.23 Discourage beach stabilization projects including snowfencing and planting of vegetation at current or potential plover breeding sites. *Snowfencing and plantings of American beach grass (*Ammophila brevigulata*), sea oats (*Uniola paniculata*), and other vegetation accelerate the processes that degrade habitat and should be avoided. Installation of snowfences and “planting” of discarded Christmas trees in blowouts, overwashes, or elsewhere on the beach should also be avoided. Atlantic Coast Piping Plover Revised Recovery Plan the extent possible, the natural processes of overwash and blowouts that perpetuate characteristics of preferred habitat should be allowed to continue unimpeded. For more detail, see pages 36-37.*

Table 3.2.2 refers to the participation of the Massachusetts Beach Buggy Association in the installation of sand fencing on Horseneck Beach. We request that the revised draft RMP clarify the role of the Association. It should also clarify the existing rules for vehicular access to the beach.

8. Landscape Zoning for the HPU. Areas where state-listed species are *likely to occur based on habitat characteristics* should be included in Zone 1. In the absence of thorough field surveys for rare species, the management plan should provide Zone 1 level protection to areas containing appropriate habitat for the rare species that are known to occur at other locations on the property.

In conclusion, we thank DCR for preparing this draft RMP, and emphasize the concern that existing conditions of the coastal ecosystem in the HPU are not sustainable. More aggressive efforts are needed to achieve a “sustainable balance” between conservation of these very important resources and the provision of recreational opportunities for the public. Thank you for considering these comments.

Sincerely,



Heidi Ricci
Senior Policy Analyst

cc: NHESP
The Lloyd Center
Westport Conservation Commission
Dartmouth Conservation Commission