

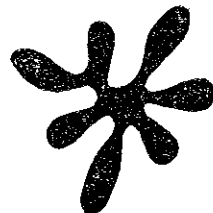
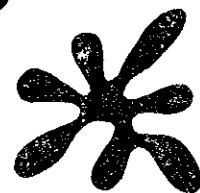
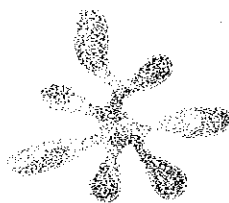
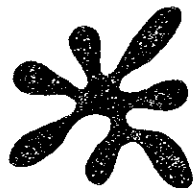
10/30/11

Dear DCR,

I am a resident of Melrose MA. I was disheartened when I read recently that funding for the Fells has not been allocated to repair and protect the existing land, nor provide staffing for rangers to oversee this vast area.

I have 2 children, ages 8 and 11. Over the years we have attended DCR sponsored programs at the Botume House. We enjoy making time to learn about and appreciate nature.

I want my children to be able to



96 Tremont St.
Malden, Ma 02148
Oct. 31, 2011

Fells RMP Comments
136 Damon Rd.
Northampton, Ma 01060

I was disappointed to read in the Malden Observer (10/28/11) that the Fells RMP re-leased on 9/14/11 makes no allowance for ranger and other Fells management staff positions. Without adequate protection and oversight, safety and tranquility will be sacrificed. This exceptional and much treasured habitat will continue to be adversely impacted. How unfortunate that bike trails and off-leash dog parks are being given priority.

When I was a child, my family and I would walk to the Fells, hike the "spotted trails," stop at Crystal Springs, and often go to the "Spot and Zep," as it was then called. We did not have to watch out for mountain bikes or unleashed dogs. How sad that this "special area" is no longer being treated as a precious habitat one that should be protected as such and not expanded.

for other recreational purposes. Even
vernal pools are no longer sacred,
I understand. Ranger and staff
management positions must be funded
& should not be discretionary spending -
they are essential!

Sincerely,
Leo Lockwood

enjoy the Fells woods, but we are not brazen enough (even as they grow older) to venture fully into the Fells. On our attempts to visit the trails we encounter unleashed dogs, trash, and poorly marked trails.

I hope to communicate with my letter that local residents are concerned for the future of the Fells. In its apparent unmanaged state we can not take pleasure in this adjacent wilderness. Please help us.

Sincerely, Cathy Schaad
Anita Schaad
Bridgette Schaad

New England Orienteering Club, Inc.

9 Cannon Road
Woburn, MA 01801
November 10, 2011

RMP Comments

136 Damon Road
Northampton, MA 01060

RE: Draft Middlesex Fells Resource Management Plan

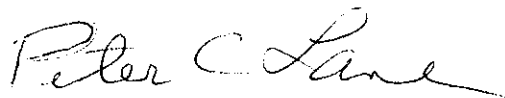
The New England Orienteering Club (NEOC) thanks all involved with trying to balance all of the differing stakeholders' interests in Middlesex Fells. We are pleased to see that the Draft Resource Management Plan allows for orienteering to continue as a permitted activity as it has for decades in Middlesex Fells.

However, we are concerned that some language in the Draft Plan appears to be hostile to or mischaracterizes the impact, primarily off-trail, of the occasional orienteering events that occur each year at the Fells. To the best of our knowledge, orienteering has not resulted in long term impacts. Accordingly, we request that all such language be softened or otherwise amended.

In addition, if all orienteering is permitted only by permit, then it precludes small informal orienteering training activities. Please amend the Draft Resource Management Plan so that they can continue as they have for a long time.

I can be reached by phone at (774) 249-9649 or info@newenglandorienteering.org.

New England Orienteering Club, Inc.



Peter C Lane
President,

November 6, 2011

Fells RMP Comments
136 Damon Rd.
Northampton, MA 01060

Dear DCR,

I have been a user of the Middlesex Fells Reservation since I came to this area to attend college in 1992. In college I primarily used the Fells as a mountain biker. More recently I have discovered the Fells as a place to hike and explore with my two young children. My son, now eight, has been hiking in the Fells since he was three. Our time in the Fells is very special to us. Not only is it a place to escape our everyday urban surroundings to explore and discuss the natural features of our world, but it is also a setting that seems to inspire long discussions on topics both serious and mundane. At the dinner table, "how was school today" will typically elicit a monosyllabic response. In the woods, however, I tend to get a long and rambling and sincere response that gives some new insight into my child's mind. This is one reason that the Fells will always be special to me.

As a user and supporter of the Fells I read the draft RMP with great interest. I was expecting to see a plan for expanded conservation efforts, as well as an attempt to balance the needs of all users of the Reservation from dog-walkers to bikers to families like mine. I expected to see some expansion of privilege for bikers and dog-walkers, and also some restriction of privileges for all users in the name of conservation. It seemed logical to me that an RMP should strike that balance.

Formalizing the use of the Sheepfold as a dog park made sense to me. It has essentially had that usage in recent years and the dogs do need a place to run and play in that area. Expanding mountain biking privileges on some additional trails to responsible mountain bikers makes sense to me also. I realize (as a past and likely future Fells biker) that bikers need access to challenging trails and as long as they are courteous and respectful (to both other users and the land) that change also is fine with me.

But I am disturbed that the draft RMP did not seem to meaningfully address the corresponding needs for clearer rules and boundaries for all users, with effective education and enforcement mechanisms. Without all of those elements it seems that the planned expansion of use will overall do more harm than good. Bringing more users into the Fells will invariably bring more irresponsible and discourteous users along with the good. Without appropriate controls and boundaries the expanded use will likely harm the environment and degrade the experience of all users. If the damage goes unchecked for too long it may become impossible to recover the Reservation to a natural state.

It is with this concern in mind that I suggest that the DCR's plan for the Fells be staged to:

1. FIRST, establish clear rules and boundaries, with appropriate education and enforcement.
2. And ONLY THEN, approve expanded uses.

By providing an actionable PLAN for expanded use, with only a SUGGESTION of enforcement, this draft RMP seems wholly inadequate for its intended purpose.

The fifth stated goal of the RMP is to "enhance compliance with rules and regulations." The "culture of noncompliance" within the Fells must be elevated to a first class concern and priority to address! One example from the RMP makes the nature of the problem clear: "Trails are clearly signed for pedestrians

only, and yet mountain bikers continue to ride these trails and advertise them on the internet" (page 31). This statement points to a problem that is not expounded or addressed anywhere else within the RMP. The internet and social media greatly amplify the disparity in the resources that the public can bring to bear in both intentionally and accidentally perpetuating illegal practices, versus the resources that DCR can bring to bear to educate users about the rules, let alone to enforce them.

The RMP notes that improved signage could reduce user confusion and accidental rule-breaking but quickly notes that this "signage will take financial and human resources" (page 59). The tone of this statement is truly concerning. If DCR does not believe it can afford to put up a few signs, then how can we possibly take seriously any other suggestions of increased enforcement? From a funding standpoint the RMP points out that "there are no dedicated operating budgets for individual properties" and when money is allocated, that "staff positions are primarily responsible for pool safety and operations, and roadway maintenance and operations" (page 44). There are therefore unlikely to be "enough" rangers to effectively monitor and educate users. The RMP indicates that "Compliance monitoring should focus on ... dogs on-leash ... owners picking up ... dog waste ... users staying on official trails ... bikers staying on trails designated for that use" and the "starting target for compliance will be 75%" (page 65). This sounds right on target to me but can the resources be allocated to achieve it?

The innocent-sounding statement that "Recommendations will be implemented as resources and opportunities come available" (page 67) is a MAJOR problem. Consider the practical implications of this statement:

- Recommendations for small one-time investments are likely to be implemented first – improved signage, suggesting new uses (off-leash dogs, bikes on more trails), updated trail maps, creation or formalization of new trails.
- Word of these changes is likely to spread quickly (and evolve in the process) via the internet and social media, and the work of well-funded user groups.
- Recommendations for longer-term investments in ongoing monitoring, ongoing user education, and enforcement of rules will come much later, IF THEY EVER COME AT ALL.

This sequence of events, directly proposed by the RMP, is unacceptable. It is backwards and needs to be turned on end. As I stated in the opening, the plan must be to FIRST demonstrate that education and enforcement can be properly supported, and only then publicize any expanded uses.

Meanwhile, even if we assume for the sake of argument that resources can be allocated, we will still have the problem that "the lack of obvious consequences ... fosters an attitude of non-compliance" (page 59). Given that "DCR rangers ... have only limited enforcement authority" (page 44) it seems that even if the necessary roles are funded and staffed the "lack of obvious consequences" will persist! There's evidence even within the RMP that DCR does not feel comfortable enforcing rules within the Fells. The RMP notes that "DCR has typically done limited enforcement or education around leash violations at the Fells" (page 63) and that "DCR has also been reluctant to strictly enforce leash regulations given the public demand...." (page 64). There are more subtle indications that the RMP is sympathetic to rule-breakers:

- Page 32 cites biker concerns over "encountering physical or human barriers to biking on trails." I don't think there are physical barriers blocking any of the bike-allowed trails and I certainly don't think pedestrians should be described as "human barriers" when, even on shared-use trails, they are the ones with the right of way!

- Page 64 notes that “courts have found that off-trail in the woods, people may have a reasonable expectation of privacy.” And cites this as a reason that MSM in the Fells are not breaking the law. But, isn’t going “off-trail in the woods” a violation in the first place?

The second stated goal of the RMP is to “**protect and enhance habitats.**” The RMP notes that “public sentiment [is] in support of protecting resources here” (page 54) and suggests that “uses ... that ... degrade significant natural ... resources, pose a substantial risk to public safety ... may be restricted, curtailed or terminated” (page 47). However in a few areas the RMP appears to actively or passively ignore this duty – ignoring or obfuscating the issues, or directly contradicting itself.

A primary concern must be off-leash dogs. The impact is clear. The RMP notes that “off-leash pets ... can disturb wildlife, particularly ground and low-shrub nesting birds” and that “Threats to mammals ... include disturbance by ... off-leash dogs ... and a lack of refuge areas” (page 16). It notes that “some dogs may dig holes and chase and even kill some birds or mammals” and that “trails with dogs had fewer deer, squirrel, rabbit and bobcat detections up to 100 meters from the trail” (page 51). Lastly, the RMP notes both that “in total, less than 1% of the Reservation is not within 50 meters of a trail” (page 14) and that “off-leash dogs may range up to 85 meters” (page 51) meaning that there is less than 1%, likely significantly less than 1% of the Fells that is not travelled by off-leash dogs (never mind that “lost dogs due to dog fights have also occurred at the Fells” and these dogs may be travelling anywhere)

It is right, then, that “The RMP ... does not recommend any additional opportunities [for off-leash dogs] beyond the designated area at the Sheepfold” (page ix).

And it is equally WRONG, therefore, that the RMP gives a significant treatment to the topic of “additional off-leash opportunities” with all of the problems these may cause. Pages 62-63 discuss the possibility of “provisions for ensuring that dogs are reliably under full voice control,” “options for providing a single designated off-leash trail or set of trails,” “courtesy hours when dogs would be allowed off-leash under voice control on trails,” and suggest that “a certified dog program .. would allow dogs who could demonstrate that they could follow required behaviors and be under full voice control to be off-leash in the Fells”

All of these seem like they would add to the already immense problem of enforcement (already “over 85% of dogs are off-leash” in the Fells as noted on page 27 and elsewhere) in two ways. 1. They would create doubt on the part of anyone attempting to enforce rules as to whether a particular user was actually in violation of the rules. 2. They would perpetuate the perception of the average user, that off-leash dogs are generally allowed in the Fells. All of this would lead to an increase in illegal off-leash usage on top of the to-be-designated “legal” uses. A more sane approach, it seems, would be to first demonstrate that compliance with the rules can be achieved and enforced. And, only then, to evaluate the possibility of expanding legal uses (while being very careful to consider the secondary effects of such an expansion).

Meanwhile the data that is presented to show the demand for expanded off-leash use is suspect. The trail use study was conducted in the winter season only, as noted in multiple places: “a winter trail use study during the 2010-2011 winter season ... found dog-walkers to be the largest group of users” (page 28). Is this surprising? I would expect a sharp decline in activities such as hiking, biking, family hikes, nature walks, etc in the winter when weather makes the outdoors less pleasant, snow and ice make the trails less passable, and the scenery and wildlife are greatly diminished. Dog-walking, on the other hand is a year-round activity because dogs need exercise regardless of the season and there are only so many

places to take them. Given that it is rational to expect a disproportionately high number of dog walkers in the winter, it seems irrational to use "winter trail usage" data to establish use priorities.

The final concern I have in regards to the RMP and its goal to protect and enhance habitats is the suggested expansion in bike trails. The RMP indicates that "with respect to environmental impacts, these two recreational uses [mountain biking and hiking] have similar impacts" (page viii) and this may well be true when users keep to designated trails. It notes that "wildlife did not respond differently to mountain biking versus hiking" (page 50) and again I assume this refers to on-trail biking versus hiking.

But if we consider the impacts of off-trail usage, we must recognize that:

- off-trail bikes are likely do more damage than off-trail hikers. For example when "features are constructed illegally ... ramps, jumps and log rides" (page 51)
- off-trail bikes can be much more disruptive to wildlife, simply because bikes can cover more ground in less time than a hiker.

On page 60 the RMP notes that the "goal should be ... not necessarily to expand the volume of either use" (hiking or biking) and yet "the team recommended designating some additional single-track trails in the eastern fells in the future (including portions of the rock circuit trail) as multi-use." This type of expansion in allowable use is likely to be swiftly and broadly publicized by user-groups and will inevitably lead to an increase in usage ... and, in turn, the increase in users will lead to an increase in rule-breaking. Expanding these behaviors, especially bringing them into the eastern Fells, seems directly contrary to the goal of preserving habitats.

Lastly I am annoyed by what appears to be a deceptive wording around a proposed change that could be very destructive to habitats. The RMP suggests that DCR "Designate 1-3 official mountain biking trails through the Dark Hollow area" (page xi). But late notes that "the sugar maple-oak-hickory forest ... east of Bear Hill and West of 93 ... merits consideration and protection as a habitat that is ... very uncommon for eastern Massachusetts" (page 13). Now, unless I am confused, the area "east of Bear Hill and West of 93" is exactly what is referred to as "the Dark Hollow area." I am afraid that the description on page 13 deliberately does not name the area by its common name to avoid highlighting the obvious conflict between these statements. Why would the RMP propose multiple new trails of any kind through an "uncommon" area such as this? And further, why would it not address the very foreseeable secondary effects that bringing in many more bikes with a number of legal trails is likely to substantially increase off-trail use in that area? On this one particular matter the contradiction and apparent attempt to obscure the issue are disturbing and irresponsible.

Thank you for reading this far. If I were to sum up my position on the RMP I would say that it does an excellent job presenting the issues and in general makes recommendations consistent with the needs of the environment and the user community. But it needs significant additional work to address foreseeable consequences and secondary effects of the proposals herein, to avoid extensive and irreversible damage to the very habitats it purports to protect. For the third and final time I will suggest that rather than implementing changes "as resources and opportunities become available" the DCR instead consider implementing changes in a prioritized order, with a full consideration of likely user responses and secondary effects.

Please recognize that full funding on an upfront and ongoing basis for all of the suggestions in this RMP is unlikely and could never be guaranteed, and therefore the RMP must provide a structure that would enable a partial implementation to still align with the stated goals. Such a structure must emphasize

education and enforcement priorities ahead of expanded uses because unless the "culture of non-compliance" is dealt with, the negative secondary effects of all other programs will be devastating.

If you have any questions about this response please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rich Sanford', written in a cursive style. The signature starts with a large, looped 'R' and ends with a long, sweeping horizontal line that extends to the right.

Rich Sanford
15 Harrison St.
Somerville, MA 02143
rich_sanford@alum.mit.edu
617 335 7310

11/6/11

Dear D(R.)

I am Eric Sanford. I am 8 years old. I live in Somerville. The tells is a nice place I walk and I want to keep this place nice so, people ~~don't~~ don't follow the rules. Just ~~the~~ solve that by making away rules that will just make the tells worse. People should have a punishment or at least a consequence for ruining the woods.

if you


Sincerely,

Eric

7 November 2011

Fells RMP Comments
136 Damon Rd.
Northampton, MA 01060

I am very concerned that DCR appears to consider recreation as the more important aspect of its mandate, and gives short shrift to conservation. This is a totally inappropriate approach to Middlesex Fells which is first and foremost a reservation whose resources need protection not exploitation. Despite the fact that funding is not available for rule enforcement in the Fells, the RMP Plan envisages opening up even more trails to biking when already bikers have misused and damaged the trails they are currently using. There is absolutely no justification for increasing biking opportunities in the Fells. This plan is not only inadequate, it is bad and needs significant revision.



Helene Ferranti
110 First Ave., Unit 403
Charlestown, MA 02129
hferranti@oeb.harvard.edu
617-242-1931

(This is a copy of an email to which I received an out-of-office response)

November 9, 2011

Dear DCR Resource Management Plan Managers,
I am writing to express our opinion that
the Middlesex Fells RMP needs significant,
further work so that it reflects goals
that protect the Fells resources, that
maintain (and fix) existing resources
and that fund needed patrol and
enforcement.

My wife and I have lived approximately
200 yds from the Ramoth Road entrance
to the Fells since January of 1977 - or
35 years this January. We've cross-country
skied its trails and sledged on its slopes
with our children in the Winter and walked
its trails often during the other seasons.

It has been discouraging to experience
the increase of uncontrolled dogs and
to encounter their waste more and
more frequently. The Fells was once

a much more peaceful place to experience
the out-of-doors, but now we encounter
more + more people who seem to act
as if the trails were their own off-leash
dog park and who do not feel responsible
for picking up the waste. The Falls
may look large on a map but misuse
and irresponsible behavior can ruin
something even this size. We

hope you can amend the F.A.P. bill
to protect the natural resources
and the safety and health of this
beautiful place.

Sincerely,

Martin and Constance
Dawgert

105 Dana Road
Medford MA

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