



November 5, 2010

His Excellency Deval Patrick, Governor
Commonwealth of Massachusetts
State House, Boston, Massachusetts 02133

RE: Resource Management Planning and the Middlesex Fells Reservation

Dear Governor Patrick,

We wish to congratulate you on your re-election and we look forward to continuing our work together to protect the commonwealth's natural resources. In that regard, we are compelled to bring to your attention a matter of great importance to the Club. Months of communications with the Department of Conservation and Recreation (DCR) over management and planning issues at the Middlesex Fells Reservation have left this correspondence as a last recourse. The Sierra Club's founding is deeply rooted in the protection of the public trust, and the Middlesex Fells Reservation has twice been featured in national Sierra Club literature highlighting our nation's most treasured – and threatened – places. It would be unfortunate for degradation of the Fells to undermine your legacy of open space and parklands protection.

Comprehensive resource management planning is essential to sound stewardship of our public lands. Ten years ago, in a similar public lands management dispute, the Sierra Club sought relief from the highest court in the Commonwealth to uphold this principle. This effort failed to achieve the desired outcome. The Sierra Club then worked closely with the legislature to correct the deficiencies in law that enabled that ruling. The statutory requirements of publicly reviewed comprehensive Resource Management Plans for *all* DCR properties, their approval by the DCR Stewardship Council, and the agency's requirement to comply with these plans, are a direct result of our efforts. Massachusetts General Law Ch. 21, Sections 2F & 2G provide a credible framework to guide the sensible stewardship of our public lands, but only if these laws are adhered to and plans are adopted for all properties as required by the statute. Quite simply, no such plan exists for the Middlesex Fells Reservation.

As you may know, a public process is ongoing at the Fells. In fact, *two* plans are underway for this property. Despite repeated requests for completion of a unified and integrated Resource Management Plan (RMP) *before any modifications in use of the property*, DCR has instead insisted on issuing a draft *Trails Plan* promoting changes in use at the Fells before the forthcoming comprehensive RMP has even been drafted. This duplicative and wasteful process undermines the credibility of *any* future Fells management directives, while squandering scarce agency resources with overlapping and conflicting efforts.

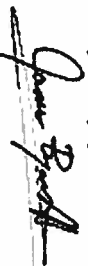
Similar challenges have arisen during your tenure as Governor: timber harvesting, biomass energy, solid waste management, safe-yield water management, and others. We have monitored these efforts, and commend your commitment to both process and science as a basis to support

complex policy directives. Unfortunately, the Fells planning process has been manipulated into a futile effort with a predetermined outcome over which many environmental groups have expressed great concern. Our organization simply cannot support the flawed Middlesex Fells Trails Planning process in its current configuration.

User conflicts have existed for decades at the Middlesex Fells Reservation. There is no conceivable imperative to support the immediate expansion of use for *any* recreational group prior to the completion of a Resource Management Plan. The failure of DCR to address our concerns strikes at the very heart of core recommendations that emerged from last year's *Forest Futures Visioning Process*, including a greater need for public transparency and clear planning procedures. Our organization supported the *Forest Future's Vision* only to have it be disregarded shortly afterwards by DCR.

We respectfully request that you direct DCR to immediately halt the Middlesex Fells Trails Planning process and any expansion of recreational uses or newly authorized uses of trails proposed therein. Please direct DCR to instead proceed with a comprehensive Resource Management Plan, consistent with the DCR management planning statute, to address both resource protection and all recreational uses at the Middlesex Fells Reservation.

Very truly yours,



James Bryan McCaffrey
Director, Massachusetts Sierra Club

Cc: Secretary Ian Bowles, EOEEA
Richard Sullivan, DCR Commissioner
DCR Stewardship Council



Commonwealth Connections reflects the collective priorities of the greenway and trail community. It addresses current concerns about conserving important community resources, reconnecting with the outdoors, and creating “greener” ways to move through the landscape. This vision plan can help link the many greenway and trail efforts underway, focus attention on the most critical issues and areas, and galvanize support for implementing greenway and trail projects throughout Massachusetts. The plan includes seven statewide recommendations and regional priorities for securing the Greenway Vision that can help shape the future of trails in Massachusetts. *Commonwealth Connections* is available at <http://www.mass.gov/dcr/stewardship/greenway/connections.htm>.

Resource Management Plans

Resource management planning forms the framework for land management based upon an inventory and assessment of environmental and recreational resources, an identification of the unique characteristics of a property or management unit, the development of clear management goals and objectives, and an implementation plan to guide the short and long-term actions. Management plans include guidelines for operations and land stewardship, provide for the protection of natural and cultural resources, and ensure consistency between recreation, resource protection, and sustainable forest management. Trail development and management must be consistent with the agency’s resource management plans.

Forest Reserves

Forest reserves are portions of state lands where commercial harvesting of wood products is excluded in order to capture elements of biodiversity that can be missing from harvested sites. Small reserves will conserve sensitive, localized resources such as steep slopes, fragile soils, and habitat for certain rare species that benefit from intact forest canopies. Large reserves will represent the diversity of relatively un-fragmented forest landscapes remaining in Massachusetts today. Large reserves will ultimately support a wider diversity of tree sizes and ages than typically occurs on harvested sites, and will also support structures and processes associated with

Trailheads	Affairs, Ranger Services		
Protect Sensitive Resources			
Initiate Implementation of all Recommendations in Section 6.4	Planning and Operations	All Partners	Ongoing
Enhance Parking and Access			
Evaluate Options for a Day Use Fee at Sheepfold			In RMP
Enhance Pedestrian Trail User Experience			
Designate Virginia Wood as "Hiking Only"	Operations		Fall 2010
Evaluating Separating Overlaps between Major Loop Trails	Planning, Operations	FOF, AMC, NEMBA	In RMP
Evaluate Options for Separating Uses by Times or Days	Planning, Operations	User groups	In RMP
Enhance Mountain Biking User Experience			
Designate Reservoir Trail as Multi-Use	Operations	NEMBA	Fall 2010
Evaluate, design and permit (if necessary) 1 - 3 official designated routes connecting Bear Hill Parking to the Sheepfold in Dark Hollow area. Enhance signage and blazing.	Planning and Operations Staff with Consultants	Hire Consultants, stakeholder input invited	Fall / Winter 2010 / 2011
Change the Winter Closure Policy for Mountain Biking to March 1 to April 15 or as Conditions Warrant	Operations		Winter 2010/2011
Evaluate Designating Sections of the Cross Fells Trail and Crystal Springs Trail as Multi-Use	Planning, Operations		In RMP
Evaluate Designating All Appropriate Trails as Multi-Use Trails	Planning, Operations		In RMP
Provide Positive Experience for Dog Owners and Their Pets			
Establish a trial designated area or times that allows dogs to socialize off leash at the Sheepfold	Operations		Fall 2010
Create and post rules regarding off-leash area and owner responsibility	Planning and Operations	FellsDog	Fall 2010
Monitor and evaluate off-leash dog use	Seasonal Rangers		On-going
Evaluate Options for Off-Leash Trail Opportunities	Planning, Operations	FellsDog	In RMP