

**From:** [Updates, DCR \(DCR\)](#)  
**To:** [Plocinski, Loni \(DCR\)](#); [Rowcroft, Jessica \(DCR\)](#)  
**Cc:** [Orfant, Joe \(DCR\)](#); [Hamilton, Susan F. \(DCR\)](#); [Garcia, Kathryn \(DCR\)](#); [Silva, Raul \(DCR\)](#); [Celino, David \(DCR\)](#)  
**Subject:** FW: Lowell/Great Brook Planning  
**Date:** Monday, August 04, 2014 9:47:05 AM  
**Attachments:** [image002.png](#)  
[Halloran, J. .7.6.03.doc](#)

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FYI. I've sent a form acknowledgment.

Anne

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**From:** Chief David Flannery [mailto:Chief@carlislefdma.org]  
**Sent:** Saturday, August 02, 2014 3:34 PM  
**To:** Updates, DCR (DCR)  
**Subject:** Lowell/Great Brook Planning

Please accept the attached letter sent to Mr. O'Halloran in 2003 regarding input for the Great Brook State Park. We are sending this in response to the extension of the public comment period.

Thank you.

**Chief David R. Flannery**  
Carlisle Fire Department  
80 Westford Street  
P.O. Box 575  
Carlisle, MA 01741-0575



Dispatch (24/7) 978-369-1442  
Office 978-369-2888  
Fax 978-287-4934

[Chief@carlislefdma.org](mailto:Chief@carlislefdma.org)



David R. Flannery  
Chief  
Chief@carlislefdma.org

## Town of Carlisle

MASSACHUSETTS

Office of

### FIRE DEPARTMENT

Dispatch: 978-369-1442

Office: 978-369-2888

Fax: 978-287-4934



80 Westford Road  
PO. Box 575  
Carlisle, MA 01741-0575

July 8, 2003

Mr. Joseph Halloran, Regional Engineer  
Commonwealth of Massachusetts  
Department of Environmental Management  
871 Lowell Road  
Carlisle, Massachusetts 01741

RE: Great Brook Farm State Park  
Duck Pond Project / Fire Protection Requirements

Dear Mr. Halloran:

This is to follow-up on our telephone conversation yesterday afternoon. As I said I met with Ray Faucher at the site on Thursday, July 3<sup>rd</sup>. This was in conjunction with the final inspection and approval by the fire department of the new comfort station constructed at the park on North Road.

The work done to protect and improve the area around the duck pond and the construction of the new facilities greatly enhances the park. DEM and your office are to be commended. This area is certainly one of Carlisle's "jewels". Unfortunately however I was not part of review process during the original design work. Therefore adequate access to the fire protection facilities (pond water) by the Carlisle Fire Department was not included. This needs to be addressed as the duck pond is the only water source available to protect not only the new comfort station but also the homes on Old North Road, the farm house, garage, barns and other outbuildings on the State Park and Great Brook Farm property. I might note that the fire department has accessed the pond over the past thirty for fires in the area. The duck pond has been our only water source in that area even prior to the State acquiring the land.

In the interests of fire protection I am making the following recommendations;

1. The pond needs to be dredged to increase its capacity for firefighting and allow for the renovation or replacement of the fire department drafting pipe on the North side of the pond. This would also improve the drafting point adjacent to North Road on the South side of the pond.

July 8, 2003

Mr. Joseph Halloran, Regional Engineer  
Commonwealth of Massachusetts  
Department of Environmental Management  
871 Lowell Road  
Carlisle, Massachusetts 01741

2. Access along Old North Road needs to be maintained for emergency equipment. The roadway needs to be wide enough for a fire truck to travel through. This is the only access for our apparatus from the pond to the dwellings on Old North Road. In addition, I would recommend that a locked gate be installed at the location where a large mound of dirt exists at the halfway point. Again the gate needs to be at least 14 feet wide.
3. The driveway or entrance to the comfort station is approximately 1650 feet in from Lowell Road therefore the street number is 165 Lowell Road. In accordance with M.G.L. Chapter 148, Sect. 59 this number needs to be posted and visible at the entrance from the street and on the building.

I would also like to see all structures in the state park be given street numbers which would identify their location in an emergency. This would greatly improve on our ability to find the location in an emergency. We have had this problem for many years at the park. We can assist you with this at the appropriate time.

I look forward to working with you and the officials at DEM in an effort to insure adequate fire protection for all facilities at Great Brook while maintaining your goals and objectives. Perhaps we could set up a meeting at the appropriate time to discuss our options and develop a plan.

With every best wish for a safe and productive summer,

Sincerely yours,

David R. Flannery  
Chief of the Fire Department

C: Ray Faucher, Super indent, Great Brook Farm State Park  
Board of Selectmen, Town of Carlisle  
Gary Davis, Super indent of Public Works, Town of Carlisle

**From:** [Updates, DCR \(DCR\)](#)  
**To:** [Plocinski, Loni \(DCR\)](#); [Rowcroft, Jessica \(DCR\)](#); [Orfant, Joe \(DCR\)](#)  
**Subject:** FW: Lowell/Great Brook Planning Unit RMP  
**Date:** Friday, August 15, 2014 2:53:39 PM

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-----Original Message-----

From: Stuart Johnstone [<mailto:stu@greatbrookski.com>]  
Sent: Friday, August 15, 2014 11:11 AM  
To: Updates, DCR (DCR)  
Subject: Lowell/Great Brook Planning Unit RMP

Thank you for the opportunity to submit comments on the Lowell/Great Brook Planning Unit Draft Resource Management Plan.

As the concessionaire for the ski touring center at Great Brook Farm State Park, I suggest the following corrections:

1. I believe that the ski concession's first season was 1977-78, not 1983-84 as stated on pages 66, 73, and 87. The concession has been operated by the same family since 1982.
2. The ski touring center currently grooms 10.5 miles of trails for cross country skiing. The Draft Plan reports this distance as "over 8 miles..." on p. 82 and as "8.3 miles..." on p. 85.
3. The Plan suggests on p. 82 that, especially since 2010, hikers are effectively kept off the ski trails so as to preserve snow conditions for skiing. To both the skiing public and the trail grooming staff, no perceptible progress has been made on this issue and it persists as a significant detriment to the quality of the program.

Sincerely,  
Stuart Johnstone

**From:** [Updates, DCR \(DCR\)](#)  
**To:** [Plocinski, Loni \(DCR\)](#); [Rowcroft, Jessica \(DCR\)](#); [Orfant, Joe \(DCR\)](#)  
**Subject:** FW: Lowell/Great Brook Planning Unit  
**Date:** Tuesday, August 19, 2014 3:58:04 PM

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**From:** Tom Brownrigg [mailto:brownriggs@comcast.net]  
**Sent:** Sunday, August 17, 2014 2:23 PM  
**To:** Updates, DCR (DCR)  
**Cc:** Cavanagh, Paul (DCR)  
**Subject:** Lowell/Great Brook Planning Unit

I thought the management plan information on natural resources and the appendices on birds and other wildlife were well written. I have a few comments regarding the bird lists.

## **RESOURCE MANAGEMENT PLAN**

### **Lowell/Great Brook Planning Unit Management Plan**

#### 1. Appendix J. Bibliography

In some of references, you use the term “Massbird Google Group”, although it is not a Google group. The following was taken from Massbird.org website. I believe that the proper term is “Massbird Listserve”. The following is from the Massbird.org website.

A Note from the Webmaster

The Massbird email list is not associated with Massbird.Org. For additional information on the Massbird email list write to the [moderator](#).

#### **Massbird Charter**

MASSBIRD is a mailing list dedicated to the interchange of wild bird and birding information relevant to Massachusetts and New England. The list is owned and moderated by [Barbara Volkle](#). This list is intended for the discussion of local issues - such as birding locations, local conditions, reports of local rarities and unusual sightings, pelagic trip reports, legislative alerts, events and speakers in the area, and calls for volunteers in research and census activities. Hopefully, novice birdwatchers, visitors to our area, and our local experts alike, will share their questions and knowledge through this mailing list. Together we have made MASSBIRD a useful forum, sharing information on a real time basis.

**Brownrigg, T. 2008.** Shrike, Carlisle. Posting on Massbird Google Group. November 6, 2008.

**Brownrigg, T. and D’A Brownrigg. 2010.** Canada warblers (and mixed nuts), Carlisle. Posting on Massbird Google Group. August 18, 2010.

**Gaudet, A. 2010a.** Great horned owl, regular merlin in L-D-T State Forest. Posting on Massbird Google Group. January 13, 2010.

**Gaudet, A. 2010b.** Northern goshawk in L-D-T. Posting on Massbird Google Group.

November 13, 2010.

**Gaudet, A. 2011.** Red-shouldered hawks at L-D-T State Forest. Posting on Massbird Google Group. February 22, 2011.

2. On August 17, 2014 my wife D'Ann & I saw an American Bittern at Great Brook Farm State Park, a bird we had not seen there previously (and only our second record for Carlisle). If it is not too late to do so, please add it to your list in Appendix G.

3. I have a short list of species (16) for Carlisle Pines State Forest. We don't bird there very often but I could send the list if you are interested.

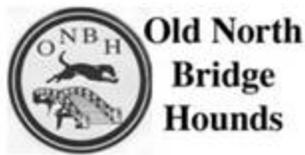
J. Thomas Brownrigg

**From:** [Updates, DCR \(DCR\)](#)  
**To:** [Plocinski, Loni \(DCR\)](#); [Orfant, Joe \(DCR\)](#); [Rowcroft, Jessica \(DCR\)](#)  
**Subject:** FW: Lowell/Great Brook Planning Unit  
**Date:** Tuesday, August 19, 2014 3:56:26 PM

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**From:** Tom Moran [mailto:TMoran@sierraops.com]  
**Sent:** Tuesday, August 19, 2014 1:59 PM  
**To:** Updates, DCR (DCR)  
**Subject:** Lowell/Great Brook Planning Unit



**Thomas Moran, President**  
**P.O. Box 625**  
**Lincoln, MA 01773**  
**781 259-1052**

Via 1<sup>st</sup> Class Mail & Email [DCR.Updates@state.ma.us](mailto:DCR.Updates@state.ma.us) – re: Lowell/Great Brook Planning Unit RMP

Department of Conservation and Recreation  
Office of Public Outreach  
251 Causeway Street, Suite 600  
Boston, MA 02114

Re: Great Brook Farm State Park RMP – Old North Bridge Hounds Comments

Dear Commissioner Murray, Deputy Commissioner Whalen, DCR staff and other plan contributors:

Thank you for the opportunity to comment on the Draft Resource Management Plan (RMP) for the Lowell/Great Brook Planning Unit and particularly as it relates to Great Brook Farm State Park (Great Brook Farm). I write on behalf of Old North Bridge Hounds (ONBH), which currently leases the Hounds House, also referred to as Woods House, in Great Brook Farm. ONBH wishes to bring to your attention some corrections to information contained in the draft RMP with respect to our organization, to confirm our interest in continuing our relationship with the park, and to offer our continued services with respect to maintaining not only the facility we lease, but also the equestrian jumps within the park.

The Old North Bridge Hounds is an all-volunteer, non-profit, educational and sporting organization which perpetuates the tradition of riding horses with hounds in New England.

Our hunt traces its roots back to the 1880's when its predecessor hunt, the Millwood Hunt, was founded and ONBH has continued the tradition for the past forty four years. Our activities include mounted riding with foxhounds, maintaining the breeding and training of working foxhounds, clearing and maintaining trails and open space, organizing and hosting riding and educational events, and educating young people and the public about foxhounds and the tradition of foxhunting.

ONBH maintains a kennel of working foxhounds and holds regularly scheduled mounted fox hunts in different venues in the central and northern areas of Middlesex County. We are a drag hunt, which means we do not hunt live foxes or other animals, rather our foxhounds and horses and riders follow an artificial scent laid by humans; neither our riders nor our hounds seek to injure any wildlife. Our mounted foxhunts and events are open to the public and we regularly have spectators come out to watch our hunts and other events. We support our activities with dues from members and from other fundraising activities including, horseback riding events and educational clinics we organize at various venues, including some at Great Brook Farm.

The Hounds House property on North Rd. in Carlisle at Great Brook Farm is ONBH's base of operations. It is the kennels where our foxhounds live; it is where we hold our meetings and certain of our other events and also provides housing for the caretakers of our hounds. The RMP mistakenly describes ONBH as a commercial operation that boards hounds. As you can see from the description above, we are not a commercial operation, nor do we board any animals other than our own and we trust you will make a correction in this regard to the final document.

ONBH has occupied the Hound House property for over twenty years and wishes to continue our relationship with DCR and Great Brook Farm. We have maintained the Hounds House and its property by providing both routine maintenance and capital improvements throughout the terms of our leases and look forward to continuing to do so under our next lease for the property. In addition we built the equestrian jumps in the park for use by the public and have maintained them through the years. We offer once again to continue our ongoing maintenance of the equestrian jumps as well.

ONBH looks forward to continuing its partnership with Great Brook Farm both by continuing the tradition of kenneling working foxhounds at the Hounds House property and by maintaining the jumps within Great Brook Farm. If we can provide any further information or assistance to you as you proceed to finalize the RMP please do not hesitate to contact me. Thank you.

Sincerely,

Thomas Moran,  
President

**From:** [Updates, DCR \(DCR\)](#)  
**To:** [Plocinski, Loni \(DCR\)](#); [Rowcroft, Jessica \(DCR\)](#); [Orfant, Joe \(DCR\)](#)  
**Subject:** FW: Lowell/Great Brook RMP  
**Date:** Friday, August 29, 2014 1:51:22 PM

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**From:** Agiorgitis, Rachel [mailto:[ragiorgitis@lowellma.gov](mailto:ragiorgitis@lowellma.gov)]  
**Sent:** Friday, August 29, 2014 1:08 PM  
**To:** Updates, DCR (DCR)  
**Subject:** Lowell/Great Brook RMP

Thank you for the opportunity to review the draft of the “Lowell/Great Brook Planning Unit Resource Management Plan (RMP)”. We appreciate the thorough and careful review that has been provided on the resources located within the City of Lowell.

The City of Lowell’s Department of Planning and Development (DPD) works closely with the Lowell National Historical Park (LNHP) and strongly supports their submitted comments on the draft RMP.

In addition, DPD would like to submit the following:

DPD would like to see planting and other improvements made to the Victorian Garden, in addition to the repair of the steel fence and granite posts. The Victorian Garden is a highly visible and important landmark in the City and should be maintained and improved on a regular basis. In doing so, the original landscape planting plan should be followed.

The Mack Plaza is also in need of improvements, such as new benches.

DPD supports improvements made to Lord Pool, especially the addition of shade trees and structures.

Items that are identified as “to be worked out with the City” will require future meetings and coordination with the City of Lowell’s Parks Department, DPW, etc.

Thank you-

**Rachel K. Agiorgitis** | *Chief Design Planner*

City of Lowell

Department of Planning and Development

50 Arcand Drive | Lowell, MA 01852

t: 978.674.4252 | f: 978.446.7014

**LOWELL** *Alive. Unique. Inspiring.*



*Commissioners*  
**Robert E. Corey**  
**William L. Morin**  
*Chairman-William "Zec" Zielinski*

**Mark R. Riopelle**  
*Executive Director-Superintendent*

**John M. Hudzik**  
*Field Service Manager*  
*Primary Distribution Operator*

**Debra H. Vinal**  
*Treasurer*

August 19, 2014

Office of Public Outreach  
Department of Conservation & Recreation  
251 Causeway Street, Suite 600  
Boston, MA 02114

RE: Lowell/Great Brook Planning Unit  
Resource Management Plan (RMP) Comments

Attention: John P. Murray, Commissioner

I am writing on behalf of the Dracut Water Supply District with comments on the draft Resource Management Plan (RMP) for the Lowell/Great Brook Planning Unit – most specifically Table 10.2 Recommendations for Lowell-Dracut-Tyngsborough State Forest.

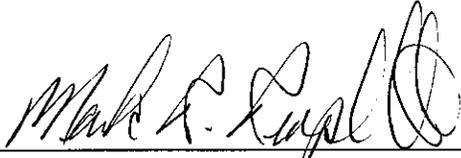
In order for you to understand the District's comments you need to know a little about Dracut Water. The District is an independent water supply agency created by the legislature in 1905 to serve the inhabitants of Dracut and Tyngsborough. There are approximately 130 miles of water mains along with 7 water booster pump stations serving approximately 800 businesses and 7200 residential customers in these communities. The District has 8 wells as our source of water and 3 water storage tanks holding 6.3 million gallons of water.

Now that you have a better understanding of the District, the following comments apply specifically to Table 10.2 Recommendations for Lowell-Dracut-Tyngsborough State Forest – Goal 4. Improve Engagement with partners, stakeholder, visitors and volunteers.

1. The District is fully prepared to meet with DCR staff to discuss the need to replace the reservoir at the forest. Attached is a copy of the new water storage tank conceptual design plans submitted to Susan Hamilton at DCR in March 2013.
2. The District is fully prepared to negotiate a formal agreement regarding our access to and maintenance of the water supply infrastructure located on Gage Hill. Attached is a copy of the draft language sent to Loni Plocinski at DCR in October 2013.
3. The District is fully prepared to work with DCR staff to address and resolve the issues surrounding the current location of the water supply infrastructure.

In summary, the District is willing to work with DCR on the above listed items in the RMP. The District understands the limited resources available to DCR. However, the top priority for the District is to replace the current water storage tank. Please contact us at your earliest convenience to begin to address this issue.

Sincerely,



8-19-14

Mark R. Riopelle, Executive Director – Superintendent  
Dracut Water Supply District

Enclosures (2): Dracut Water New Water Storage Tank Conceptual Design Plans  
Draft Agreement Language

cc: Board of Water Commissioners  
Attorney Arthur C. Sullivan  
Attorney Edward L. Morris



# Northern Middlesex Council of Governments

August 29, 2014

Jack Murray  
Commissioner  
Department of Conservation and Recreation  
Office of Public Outreach  
251 Causeway Street, Suite 900  
Boston, MA 02114

A Multi-Disciplinary  
Regional Planning  
Agency Serving:

Billerica  
Chelmsford  
Dracut  
Dunstable  
Lowell  
Pepperell  
Tewksbury  
Tyngsborough  
Westford

RE: Lowell/Great Brook Planning Unit RMP

Dear Commissioner Murray:

The Northern Middlesex Council of Governments (NMCOG) has reviewed the *Lowell/Great Brook Draft Resource Management Plan (RMP)* pertaining to the Lowell-Dracut-Tyngsborough State Forest, Lowell Heritage State Park, Great Brook Farm State Park, Carlisle State Forest, Warren H. Manning State Forest, Billerica State Forest, and Governor Thomas Dudley State Park.

The Department of Conservation and Recreation is directed by a legislative mandate (M.G.L. Chapter 21, Section 2F) to prepare management plans for every reservation, park and forest, to provide guidelines for the management and stewardship of natural and cultural resources and ensure consistency between recreation, resource protection and sustainable forest management. The legislative mandate also requires the incorporation of public review and input into the development of management plans, and review and adoption by the DCR Stewardship Council.

The RMP's guiding Management Principle is to "Protect the natural and cultural resources of the planning unit and provide enhanced recreational and educational opportunities for visitors through the creative use of state resources and partnerships". Overall goals include:

- Preserving natural and cultural resources through appropriate stewardship strategies;
- Offering diverse recreational opportunities and facilities to ensure visitor safety and access;
- Addressing underutilized buildings and structures to improve visitor experiences and DCR operational responsibilities; and
- Improving engagement with partners, stakeholders, visitors and volunteers.

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Matthew J. Hanson  
Chair

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Beverly A. Woods  
Executive Director

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40 Church Street  
Suite 200  
Lowell, MA  
01852-2686

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FAX: (978) 454-8023

[www.nmcog.org](http://www.nmcog.org)

For each goal, the RMP identifies management recommendations, which are categorized by priority (i.e., high, medium or low) and resource availability. High priority recommendations are those that address regulatory compliance or public health and safety; prevent immediate damage to, or loss of, resources; or repair or replace damaged equipment or systems critical to operations, and are typically time sensitive. Medium priority recommendations maintain existing resources and visitor experiences. Low priority recommendations enhance resources or visitor experiences; they are not time sensitive. In total, the RMP contains 150 management recommendations; 69 of which are classified as high priority.

#### **NMCOG COMMENTS**

NMCOG attended the Public Meeting on Monday, July 21, 2014 at UMASS Lowell Alumni Hall, and solicited comments from regional stakeholders and other partners in our jurisdiction. We have developed the comments provided below based on the review performed by our staff and comments received from other stakeholders.

#### **Collaboration and Stakeholder Engagement**

The initial public meeting for the *Lowell/Great Brook Draft Resource Management Plan (RMP)* was held on July 23, 2012 at Great Brook Farm State Park in Carlisle, and 20 people were in attendance. It appears no additional outreach, public meetings or stakeholder engagement occurred after that time until the public meeting on July 21, 2014. At that meeting many stakeholder groups, as well as the general public, voiced concerns that they were not adequately consulted during the development of the Plan. As such, the public, as well as groups such as the Lowell National Historic Park (LNHP), the Pawtucketville Citizens Council, the Friends of the Forest group, the Greater Lowell Indian Cultural Association (GLICA) and the Merrimack Valley Chapter of the New England Mountain Bike Association should have been provided with additional opportunities for input while the Draft RMP was under development.

Further collaboration is needed before DCR finalizes the Resource Management Plan. In particular, discussions should be held with all stakeholder groups involved with the DCR properties that comprise the *Lowell/Great Brook Draft Resource Management Plan (RMP)*. These discussions should be in addition to any public meetings that may occur, and should be used to coordinate and align efforts, and determine priorities and recommendations.

Collaboration with the National Park Services (NPS) is especially important. As currently written, the plan describes working with NPS to conduct repair and maintenance work. However, DCR's expectation for the level of involvement from

NPS is unclear. For example, it is unclear who will be funding and carrying out the work at the Lowell National Heritage State Park. It is crucial to hold open discussions with the NPS to establish reasonable expectations for the repair and maintenance work needed in the Lowell National Heritage State Park.

### **Prioritization**

There are many recommendations throughout the document that need to be reclassified and reprioritized. In particular, NMCOG believes some of classifications need to be reconsidered to ensure safety at the parks and to ensure a more consistent classification system between park properties.

For the Lowell Heritage State Park (Table 10.3), DCR's recommendation to "Work with Boott Hydropower, Inc. to implement the recommendations featured in the DCR's Office of Dam Safety dam inspection reports for the Northern Canal Great Wall, Guard Locks, Swamp Locks and Lower Locks dams" is categorized as a low priority. However, structural issues associated with the dams could result in public safety concerns, and failure of the dams could cause damage to resources and equipment. Consequently, this should be viewed as a time-sensitive, high priority issue, and should be categorized accordingly.

As mentioned at the public meeting on July 14, 2014, the Lowell-Dracut-Tyngsborough State Forest is very popular, and cars are often double- and triple-parked along the side streets in the neighborhood. The lack of a formal parking area can cause significant pedestrian safety issues, especially for members of the population with physical disabilities. Despite this, Table 10.3 categorizes DCR's recommendation to "Formalize the main parking area" as a medium priority. On the other hand, adding handicapped accessible parking spaces within the Warren H. Manning State Forest is categorized as a high priority (Table 10.6). Adding a formal parking area containing handicapped parking at the Lowell-Dracut-Tyngsborough State Forest, should be considered a high priority. Adding a safe parking area, especially for people with disabilities, should be considered a high priority at all DCR properties outlined in the Draft RMP.

Installing new signage at the Lowell-Dracut-Tyngsborough State Forest and Lowell Heritage State Park is classified as medium priority (Table 10.2 and 10.3), however identifying an "appropriate location for an entrance sign that recognizes partners" is given a high priority for Billerica State Forest (Table 10.8). Installing new signage should be a high priority in the Billerica State Forest, the Lowell-Dracut-Tyngsborough State Forest and the Lowell Heritage State Park.

Discrepancies such as those described above should be remedied throughout the text. High, Medium and Low priorities should be clearly defined and should be consistent between parks. If DCR feels variation between the classifications is warranted, then a narrative should be provided outlining the rationale for such discrepancies. (For example, if parking is a high property at one location and not another, this should be discussed). It would also be helpful to have a narrative associated with the recommendations for each property, to better describe how recommendations were classified for that property, and to highlight the major concerns at each location.

### Canalway

The Northern Middlesex Council of Governments has been working with The LNHP, DCR, the City of Lowell and MassDOT on the Pawtucket Falls Overlook project. MassDOT has committed funding for this project and DCR has made a commitment to participate in the project as well. Therefore, this project should be mentioned in the Draft Resource Management Plan.

Should you have any questions regarding the NMCOG staff comments please feel free to contact me directly at (978) 454-8021, ext. 120.

Sincerely,



Beverly Woods  
Executive Director

cc: Billerica Town Manager, Board of Selectmen, Planning Board, Planning Director, Conservation Commission, Conservation Agent, NMCOG Councilors

Carlisle Town Administrator, Board of Selectmen, Planning Board, Conservation Commission, Recreation Commission

Dracut Town Manager, Board of Selectmen, Town Planner, Planning Board, Conservation Commission, Conservation Agent, Recreation Department, NMCOG Councilors

Lowell City Manager, City Council, Planning and Development Director, Director of Recreation, Conservation Commission, NMCOG Councilors

Tyngsborough Acting Town Administrator, Board of Selectmen, Planning Board, Conservation Commission, Conservation Agent, Recreation Director, NMCOG Councilors



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Lowell National Historical Park  
67 Kirk Street  
Lowell, Massachusetts 01852-1029

August 29, 2014

Jack Murray  
Commissioner  
Department of Conservation and Recreation, Office of Public  
Outreach, 251 Causeway Street, Suite 600,  
Boston, MA 02114

Dear Commissioner Murray,

Lowell National Historical Park has reviewed the Massachusetts Department of Conservation and Recreation Bureau of Planning and Resource Protection Resource Management Planning Program July 2014 – Public Review Draft Resource Management Plan Lowell/Great Brook Planning Unit and provides the following comments related to the Lowell Heritage State Park.

The Lowell National Historical Park (LNHP) 1981 General Management Plan prepared in cooperation with the Massachusetts Department of Environmental Management (DEM) established a program for interagency management of cultural resources within Lowell National Historical Park and Lowell Heritage State Park. According to a 1979 agreement between the National Park Service (NPS), DEM and the Locks and Canals Company, the preservation and management of the Lowell canal system was to be shared by the three parties. The agreement identified DEM as the lead agency for development and maintenance of the canal banks and walls. Gatehouses were to be jointly developed by DEM and NPS and maintained jointly by DEM and Locks and Canals. Over the years however, the NPS has assumed the primary responsibility for the rehabilitation and maintenance of the canal banks and walls and gatehouses.

In 2012, the NPS announced a new national initiative called “The Capital Investment Strategy,” designed to promote both the improvements and the long term upkeep of high priority NPS historic buildings and monuments, critical infrastructure, and facilities that serve visitors. Beginning in 2015, NPS units requesting project funding to repair, retrofit or improve these assets will receive preference when that project request aligns with long-term maintenance strategies in the park asset management plan where priority is given to federally owned facilities. Therefore DCR owned facilities currently maintained by LNHP that are not covered under legal agreements or not eligible for matching State funding, will fall into the lowest priority when competing for future NPS funding. It is more critical than ever for DCR and the NPS to work

together to develop a long term strategy for the maintenance and preservation of DCR owned assets located within the Lowell Heritage State Park (LHSP) and LNHP.

**General Comments:**

The extensive involvement of Lowell National Historical Park (LNHP) in the preservation and management of DCR owned resources within the Lowell Heritage State Park has clearly been recognized by DCR, yet LNHP was not consulted in the development of the draft plan and in the evaluation and formulation of recommendations. A planning workshop with LNHP, DCR and City of Lowell staff to develop a coordinated plan for management of the resources in the National and State park is highly recommended prior to the finalization of this plan.

There are numerous references throughout out the plan to “work with NPS” to accomplish repair/maintenance work. Since many of these work items are not included on the list of recommendations or do not have any funding identified, is it DCR’s expectation that this work can/will be accomplished by NPS? There are other more specific recommendations for DCR to “Work with NPS to repair.” Examples include:

p.44 Pawtucket Gatehouse: “One end wall of the gatehouse has experienced some cracking, but it is otherwise in good condition.” [Goal 1 Recommendation: “Work with NPS to repair the cracked end wall of the Pawtucket Gatehouse.” M2]

p.47 Hamilton Waste Gatehouse: “Very poor condition and lacks interpretive information.” [Goal 1 Recommendation: “Meet with NPS to develop and implement a preservation plan for the Hamilton Wasteway Gatehouse.” H1]

p. 48 Boott Dam Gatehouse: [Goal 1 Recommendation: Work with NPS to remove the Boston ivy from the Boott Dam Gatehouse.” M2]

LNHP recommends there be a LNHP/DCR discussion prior to finalization of the plan to establish a framework for reasonable expectations.

Zone 1 Description states that: “This zone encompasses areas with highly sensitive ecological and cultural resources that require additional management approaches and practices to protect and preserve the special features and values.” While we agree the Lowell Heritage State Park is a heavily developed urban landscape it contains ‘highly sensitive cultural resources’ that require unique and in many instances complex management approaches and practices to protect. DCR designation of the Lowell Heritage State Park in Zone 3 suggests that DCR priorities in the Lowell Heritage State Park are on the park headquarters, Lord swimming pool and beach areas at the exclusion of the historic resources. This is increasingly problematic as the NPS Capital Investment Strategy restricts the expenditure of federal funds on non-NPS properties such as DCR gatehouses, which have been in recent years, maintained by the NPS.

DCR has identified Dam rehabilitation and Maintenance as a high priority, but no funding is programmed for the foreseeable future. The LNHP does not have any funding available for this work which is estimated at well over \$1M. Some of these resources are in imminent danger of

failing. As previously mentioned, because the NPS does not own these resources, future federal funding for rehabilitation will be a low NPS priority.

The Waste Gatehouse on the Northern Canal Great Wall Dam has serious structural issues. Approximately 14-feet of the bottom sill on the river side has fallen out. The LNHP spent \$1,500 for an emergency repair to stabilize the gatehouse. A more expensive permanent solution is needed to address the underlying causes of the issue; overtopping of the wall due to high flow rates which are also undermining public use of the Great River Wall Walkway. The requirement for public access on this walkway is a flow rate of 3,500 cfs.

There is only passing reference on Page 54 to the 1986 Order of Taking of the canal-side right-of-way and no discussion of the Canalway Development program that has been underway for the past 25-years. Lowell Heritage State Park was part of the Canalway Task Force that developed the vision plan for creation of the Canalway. DCR (DEM) played a major role in the implementation of the walkway system through the acquisition of the right-of-way and recreational and air rights from Locks and Canals. While the LNHP and City of Lowell have been most active in recent design and development of the system, there are a couple of significant remaining sections of the Canalway where DCR owns the primary R-O-W (Upper Pawtucket Canalway and Pawtucket Falls Overlook) that will require the support and active involvement of DCR to complete.

The LNHP has been working with DCR, the City of Lowell, the Northern Middlesex Council of Governments, and Mass Highway Department to develop a funding program for construction of the Pawtucket Falls Overlook project which will extend the Vandenberg Esplanade on DCR owned land from its current terminus at the Bath House to the School Street Bridge where it connects to the Canalway at the Northern Canal Island and Pawtucket Gatehouse. Mass Highway has committed approximately \$3M in surface transportation and Congestion Mitigation Air Quality (CMAQ) funds for construction of the project. By Letter of February 26, 2014 signed by Commissioner John P. Murray, DCR has committed to participate in this project on certain terms, but there is no mention of the project in the Draft Resource Management Plan.

**Specific Comments:**

1) p.37 “DCR continues to concentrate its resources on the riverfront portion of the park and uses the legal agreements with its original partners, the City of Lowell and National Park Service, to operate and maintain facilities parkwide.” [Goal 4 Recommendation: Renew MOU, H1]

**Comment:** As previously noted, NPS Capital Investment Strategy will greatly limit potential for NPS investment in the future.

2) p.44 Blacksmith Shop:

**Comment:** The NPS has observed numerous structural issues with the building. In addition, the roof is in need of replacement.

3) p. 46 Tremont Gatehouse: “Excellent condition reflecting maintenance work that was done to remove the extensive ivy growth” that formerly covered the building.

**Comment:** In 2010 the LNHP repointed the building and applied a graffiti preventive coating on the brick. In 2011 NPS repaired all the windows and doors on the building.

4) p.47 Swamp Locks Gatehouse: A section was reconstructed sometime after 1994.

**Comment:** In 2013 the LNHP repaired the clad board and trim and repainted the building.

5) p.49 Lowell Canal System: "The canals are generally in good condition, however, some vegetative growth and localized deterioration was observed in the canal walls while conducting fieldwork for this plan."

**Comment:** Over the past 4 years the LNHP has averaged about \$52,000 thousand dollars a year in project funding for removal of canal wall vegetation along various sections of the canal system. The LNHP has not been awarded funding for FY15 or out years.

6) p.52 NPS Canal Boat Tours: "Boating takes place in the Merrimack and Concord rivers and, to a limited extent, in the canal system"

**Comment:** add to end of sentence: "where boating is limited to NPS canal boat tours." Revise paragraph to include the following: The NPS offers motorized boat tours on the Pawtucket Canal from Lower Locks to the Merrimack River. Each tour included a locking demonstration. Short boat rides are also offer on the Merrimack River in the summer season. Also note, The LNHP relies on DCR transportation and recreations rights.

7) p.53 Interpretive Programming: "NPS provides most of the interpretive programming with the downtown portion of park. Visitors can participate in a free ranger-guided walking or trolley tour of the historic sites. A variety of indoor exhibits are open to the public too, including the NPS's visitor center at Market Mills, the Boott Cotton Mills Museum (fees apply), the Patrick J Morgan Cultural Center and the Wannalancit Mill."

**Comment:** Correct spelling of 'Mogan' and revise paragraph to state: "NPS provides many of the interpretive programming within the downtown portion of Lowell National Historical Park. Visitors can participate in free NPS ranger-guided walking tours and trolley rides between the historic sites. A variety of indoor exhibits are open to the public, including the NPS Visitor Center at Market Mills, the Boott Cotton Mills Museum (fees apply), the Boarding House at the Patrick J Morgan Cultural Center and the Wannalancit Mill."

8) p.54 Interpretive Programming: "The NPS also co-sponsors one of the largest, free folk festivals in the world; the Lowell Folk Festival is held each summer and over 100,000 people come to Lowell and the park to celebrate traditional music..."

**Comment:** LNHP uses 150,000 in its reports

9) p.56 Mack Plaza: "For several decades, the condition of the granite posts has been deteriorating. Today, 11 of the 13 posts are badly cracked, several posts are being held in place by a temporary wooden support structure. In 2007, a close inspection of the fence identified the pin mounting system and temperature changes in the steel as the likely causes of cracking." [Goal 1 Recommendation: "Repair the steel rail and granite post fences at the Mack Plaza and Victorian Garden." H3]

(and)

p.56 Victorian Garden: There are 25 granite posts in this fence and 22 are badly cracked. One post that supported the garden's western gates was recently removed for public safety reasons."

**Comment:** There is no mention of the Brick Vault, and missing Victorian light pole on Mack Plaza near Merrimack Street. Repair work at the Mack Plaza and Victorian Garden are identified as a high priority, but no funds are programmed for the foreseeable future. These are highly visible and heavily used public spaces that are in critical condition. Is there at least an interim plan for stabilization?

Also of note, the Victorian Garden was developed based on an historic landscape design plan. Over the years this landscape has been seriously undermined. Future plans for rehabilitation should be considerate of the original landscape plan.

10) p.56 Edmund A Bellegarde Boathouse:

**Comment:** The Tsongas Industrial History Center (TIHC) a joint educational program of the LNHP and University of Massachusetts, Lowell uses the Bellegarde Boathouse and areas nearby for several educational programs: River as a Classroom, Bridging the Watershed and The Science of Rivers. The LNHP is investing over \$200,000 in the construction of a new docking facility at the Bellegarde Boathouse which should be operational in the spring of 2015. The Park is also acquiring a new 40-ft river exploration boat for use by the TIHC and other LNHP interpretive programs. The boat will be docked at the new Bellegarde Boathouse docking facility.

11) p.57 Trolley Tracks:

**Comment:** LNHP is working with the City of Lowell, Lowell Regional Transit Authority and other community partners to pursue the possible expansion of the Park trolley system into a larger public transit system. Improvements to the existing line to facilitate the expanded operation and to enhance the existing Park trolley operation will require air rights easements from DCR for trolley bridges over the Merrimack Canal.

12) p.57 Public Art: "While a few of the sculptures are located on DCR property, e.g. 'The Worker' in the Mack Plaza, the collection is owned by the City of Lowell, through its Cultural Affairs and Special Events department and the National Park Service, both of whom are responsible for its ongoing maintenance."

**Comment:** According to a 1997 inventory of the Lowell Public Art Collection completed by the Lowell Office of Cultural Affairs, The Worker was commissioned by the Lowell Heritage State Park and is owned by DEM. Through the years, both DCR and NPS have contributed to maintaining the sculpture. Currently, there is no agreement between DCR and NPS outlining maintenance responsibilities.

14) p.59 Trails: "There is one trail within Lowell Heritage State Park; it is a 10-foot-wide paved path located along the northern shoreline of the Merrimack River."

**Comment:** There is no mention of the Canalway and Riverwalk which provides over 5-miles of public walkways throughout the city. See note under General Comments.

15) p.60 Natural Resources: "Within downtown Lowell, the National Park Services maintains the grounds around the canal system resources."

**Comment:** The NPS is not solely responsible for maintenance of grounds around the canal system resources. See Background Section for information regarding the original plan for maintenance of canal resources.

16) p.61 Lowell Canal System MOU: A five year maintenance MOU was signed in 1991. "DEM and NPS worked together to maintain and secure the buildings and grounds. The DEM and NPS also agreed to meet each year in order to develop building maintenance, destructive vegetation clearing, canal water surface cleanups and long term capital improvement programs." "The maintenance and operation of the canal system continues today under somewhat agreeable, if not confusing, terms, in the absence of any legally binding document."

**Comment:** The NPS has been working with the City of Lowell to develop a GIS inventory and tracking system for identifying ownership and maintenance responsibilities of Canalway and Riverwalk system grounds and facilities. The database information is expected to form the basis for the development of a new MOU for Lowell canal system maintenance in the very near future.

Please feel free to contact me if you have any questions about these comments from Lowell National Historical Park. I can be reached at 978 275-1703 or via email at [celeste\\_bernardo@nps.gov](mailto:celeste_bernardo@nps.gov).

Sincerely,



Celeste Bernardo  
Superintendent