



November 19, 2010

Paul Jahnige
Middlesex Fells Trail Plan
163 Damon Road
Northampton, MA 01060

RE: Middlesex Fells Reservation Trail System Plan Comments

Dear Mr. Jahnige:

The Mystic River Watershed Association appreciates the opportunity to comment on the Middlesex Fells Reservation Trail System Plan.

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the Mystic River Watershed. The mission of MyRWA is to work to protect and restore the Mystic River, its tributaries and watershed lands for the benefit of present and future generations and to celebrate the value, importance and great beauty of these natural resources. This includes working to improve the water quality in the Mystic River and all of its tributaries. As the largest piece of open space in the watershed, the Middlesex Fells is an important component of the Mystic River watershed. It is a part of the natural resources that we celebrate for its value, importance and great beauty.

First, the Mystic River Watershed Association joins with the Friends of the Middlesex Fells Reservation, Massachusetts Audubon Society, the Massachusetts Chapter of the Sierra Club and several other environmental organizations in calling for a comprehensive Resource Management Plan (RMP) for the Middlesex Fells Reservation, which will address both resource protection and recreational uses at the Fells. The comprehensive Resource Management Plan is required by law, and should be completed before the implementation of the trails plan. There should be no changes or increase in recreational use in the Middlesex Fells until the RMP has been completed.

However, there are several areas of this plan that should be addressed specifically. First, there are eight rare or endangered species that occur in the Fells. There are also over 100 vernal pools in the Fells. These are two of the components of the complex and diverse habitat that make up the Fells. Any plan for the Fells must include a considerate and comprehensive approach to the protection of these endangered species and habitats. A trails plan on its own does not do this. Rather, the process should be incorporated into an RMP that comprehensively addresses how the rare species and habitats will be protected while providing for recreational use of the Fells.

As the plan itself states “[T]he most difficult aspect of user behavior in the Fells . . . is a pervasive attitude that posted rules don’t always apply.” (Plan, p. 17) As the Plan points out, this attitude includes all groups of users of the Fells, but perhaps most egregiously by dog owners. This also includes the unauthorized use and development of trails by both hikers and bikers. The DCR

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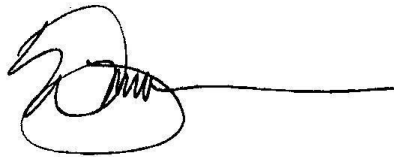
should utilize its resources to work on halting illegal and illicit activities on the Fells trails, including, but not limited to, closing unauthorized trails, halting the unauthorized use of trails, enforcing leash rules and increasing enforcement all regulations to protect the natural resources of the Fells and the health and safety of the public that uses the Fells.

One area of special concern for the Mystic River Watershed Association is dogs on the Fells. The current regulation is that all dogs using the Fells must be leashed. However, as the plan notes, this is the single rule that is violated the most. We recommend that careful consideration be given as to the best approach to dog use of the park and that this approach be clearly memorialized in park regulations and strictly enforced.

We strongly support not going forward with the Middlesex Fells Reservation Trail System Plan, or expanding the recreational uses of the Fells until a comprehensive Resource Management Plan for the Fells has been completed.

We would like to again thank the Department of Conservation and Recreation for this opportunity to comment on the Middlesex Fells Reservation Trail System Plan. We appreciate the hard work that has gone into this project, but would ask that this plan not go forward until it can be incorporated into a comprehensive Resource Management Plan for the Fells.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized initial 'E' followed by a series of loops and a long horizontal line extending to the right.

EKongKar Singh Khalsa
Executive Director
Mystic River Watershed Association