



November 11, 2011

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

RE: Middlesex Fells RMP 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 a critically important component of the Mystic River watershed. As a unique area of unbroken open space, the Fells provides a unique refuge for many plant and animal communities that require appropriate habitat to survive. The Middlesex Fells, wisely preserved as green space by visionaries of an earlier time, is one of the natural treasures in the watershed that we celebrate for its value, importance and great beauty.

Land Stewardship Zoning

We enthusiastically support the development of Land Stewardship Zoning within the Fells as outlined in the draft RMP. Protecting sensitive areas, endangered and rare species and cultural resources is a fundamental purpose and goal of the Fells. This is outlined in the draft RMP. Protecting those areas outlined in the draft is important. We encourage the use of such zoning to protect those areas, and we recommend increasing those areas of the Fells that can be protected by such zoning.

Pedestrian & Mountain Biking Recreation

We agree with and encourage the principle that in developing trail management recommendations, it is “important to close some trails to allow creation of more and larger undisturbed patches and protect existing trail-free areas from intrusion by all recreational users.” We encourage the development and protection of undisturbed/trail-free areas within the Fells. Such areas enhance the wildlife and other natural values of the Fells, as well as landscapes ability to produce clean water and air. Therefore we support efforts to prohibit off trail uses of the Fells. It is important that explanation of this rule is included in any interpretative signage on the trails of the Fells. Those users, such as birders and walkers, who feel that their off trail use is not intrusive, need to understand that their behavior is intrusive, and needs to be controlled. For other users, such as hikers, mountain bikers and dog walkers, increased enforcement of off trail prohibitions is appropriate. NHESP has identified species and habitat types within the Fells that are sensitive, and every effort must be made to protect those resources.

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To that end, we accept that hiking and mountain biking are uses of the Fells that will remain. However, we do not feel that it is appropriate to increase mountain biking within the Fells. Rather we believe that limitation to the number of areas and trails that are open to hiking and mountain biking is appropriate. It is clear that the presence of mountain bikers is controversial in some circles while others celebrate this sport as great outdoor fun. From our perspective it simply does not seem appropriate to increase access to or increase the number of mountain biking trails within the Fells. There appear to be more than sufficient trails and biking areas to accommodate this use and there is evidence that this activity can substantially impact the natural areas in which this activity is permitted. Restricting the number of biking trails in the Fells seems entirely appropriate especially when one considers that there are over 30 miles of developed mountain biking trails in the Harold Parker State Forest, only 15 miles north of the Middlesex Fells. As the draft RMP speaks of the need to close and reduce the number of hiking trails, that need should be shared by the mountain bikes as well. We understand the recommendation for creating a mountain biking trail in the Dark Hollow area to address other issues, but that development should be only one trail, and not the 1-3 as outlined in the draft RMP.

Recreation with Dogs

The proposed strategy for recreation with dogs in the draft Fells RMP is flawed from the outset. The major flaw in these proposals is that none of them take into consideration those Fells users who do not want to interact with dogs. All of the proposals discussed are aimed at increased use of the Fells by dogs; none of them propose reducing dog use in the Fells.

The proposed RMP contains many documented examples of conflicts between users with dogs and those without. The RMP's own conflict research showed that "the most prevalent conflicts centered around dogs." (RMP p. 32). In the period of 2007 – 2010 there were far more reported incidents concerning dogs (19) than mountain bikes (1). (RMP p. 29). There were anecdotal reports of dog waste becoming so prevalent on cross country ski trails during the winter of 2010 – 2011 that people simply no longer wanted to use them. This anecdotal evidence was supported by DCR's own research. (See Table 2.6.4. and following text on p. 32.) All groups of users complained equally of both off-leash dogs and owners not picking up after dogs. Id. In fact, the majority of users of the Fells (56%) reported experiencing conflicts with off-leash dogs. Yet with all of this evidence of the problems of dogs on the Fells, the proposals in this draft RMP make no attempt to control or reduce the number of dogs on the Fells.

To address these problems we suggest several recommendations be incorporated into the RMP. First, the Sheepfold area has been sacrificed to dogs as an off-leash area. It must be acknowledged that by creating this off-leash area, others are impacted. (The Skyline Trail goes through the Sheepfold, those who are hiking the Skyline Trail without dogs and who have no desire to encounter dogs are forced by this arrangement to go through a heavily used off-leash area.) This problem needs to be addressed, perhaps by erecting an attractive fence separating the Sheepfold from the trail.

But of the other recommendations for recreation with dogs at the Fells, only the enhancement of enforcement of current leash regulations throughout the park is acceptable. Given that the Sheepfold has already been designated an off-leash recreation area, no other areas of the Fells, including none of the trails, should be considered for off-leash recreation. The idea that only those dogs under "voice control" will be allowed to participate in off-leash recreation is an opening to abuse. While dog owners will deny it, the vast majority of dogs are simply not trained well enough to be under effective voice control, which therefore is no control at all. Except in that part of the Fells designated as an off-leash area, because of the high levels of use by persons who are not dog owners and because there have been many objections to off-leash dogs on the trails, it is never appropriate to rely upon this method of control in our opinion.

The idea of "courtesy hours" off-leash recreation is no courtesy at all to those who would use the Fells without dogs during those hours. Those who use the Fells to observe birds and wildlife are most likely to do so between dawn and 9:00 a.m. when wild animals are most likely to be active. The idea of off-leash "courtesy hours" during this time is a direct conflict of uses. Such a plan would just cement the idea that off-leash recreation by dogs is ok in the Fells. It needs to be understood, as documented by the research in the draft RMP, off-leash recreation by dogs anywhere else but the Sheepfold is not supported by the majority of users of the Fells. In addition, the draft plan does nothing to address all of the problems related to dog use in the Fells

identified in the draft RMP (p. 51). Creating a certified dog program is also just a hoped for outcome and is unlikely to ever be implemented. While dogs can be well trained, and mostly under control, the program as outlined in the draft RMP simply assumes that such dogs will stop being dogs. This seems unlikely.

We request that DCR as the respected manager of the Fells, recognize that limiting access to dogs in some or all of the Fells is an acceptable practice. Limiting access to dogs is not only acceptable, but it is the appropriate outcome for many users of the Fells. Many people, for many reasons, do not want to deal with or encounter dogs or dog waste while using the Fells. This is true despite the fact that most people like dogs and enjoy their company. This is true because of the relatively intensive use of the resource by a large number of dog owners in the densely developed communities surrounding the Fells. It is important that this fact be incorporated into the draft RMP. Recognition of these challenging facts on the ground must inform the approach to use of the Fells by dogs and their owners and we hope will be acknowledged by those who feel that the entire Fells should be open to off-leash recreation by dogs.

We recommend that DCR adopt a page from the California State Parks system, which routinely closes trails to dogs in state parks. Just as the draft RMP proposes to manage mountain bikes by limiting access to bikers, so should the draft RMP manage dog use by limiting access to parts of the Fells to dogs.

Rules Compliance and Enforcement

There is no question that all of the recommendations in the draft RMP will come to nothing if there is not enhanced enforcement of the rules governing behavior of those who use the Fells. The plans outlined in the draft RMP for increasing compliance and enforcement of those rules and changes in the Fells require an increased enforcement presence. There is no question that the current culture of non-compliance that pervades the use of the Fells will not be curtailed without increased enforcement. The draft RMP calls for that increased enforcement, but without proper funding, there is simply no way these recommendations can be implemented, and all of the work of the draft RMP will come to naught. Therefore, we encourage the DCR and all user groups involved with the Fells to work with the political establishment to put the required funding in place to preserve the Middlesex Fells.

We would like to again thank the Department of Conservation and Recreation for this opportunity to comment on the Middlesex Fells Reservation draft Resource Management Plan. We appreciate the hard work that has gone into this project, but we ask that the preservation of the resource that is the Middlesex Fells be the most important focus of this process.

Very truly yours,



EKongKar Singh Khalsa
Executive Director
Mystic River Watershed Association