

## Comments on DCR Fells Draft Plan

I am really excited about these potential changes in the Fells. Fells policies have been sealed in a bubble for a very long time. They are WAY overdue for some updating.

I attended the DCR meeting where Paul presented the draft plan, and I also read the plan cover to cover before writing this message. I have to say that overall, it is a very good, comprehensive plan. There are many many parts of the plan I completely agree with, but also some parts I do not.

First and foremost, I think the Skyline trail needs to be taken OFF the table, as a hiking-only trail. I don't see any need of there being any hiking-only trails. But if there has to be some, this trail is not appropriate to be one.

Reasons why I think this:

- The Skyline trail is the "Flagship" trail of the Fells. Reserving it for hikers only maintains the double standard in the Fells, of treating bikers like (at best) second class citizens or (at worst) criminals.

- The Skyline trail is not secluded. It loops through the West side of the Fells, repeatedly crossing all of the most popular trails in the Fells. If there has to be a hiking-only trail, that trail should be out in the secluded corners of the Fells, in areas where traffic is already very low.

- A huge portion of the Skyline trail's tread is on solid rock. Many of the short eroded dirt climbs could be rerouted to even more rock. This high rock content makes the skyline trail one of the most resilient to traffic. You can't get more sustainable than solid rock.

- The Skyline trail is arguably the most desirable trail in the Fells. It's a very long and technical trail. Exactly what makes it a great hiking trail, makes it a great biking trail. (aka multi-use)

- Hiking-only trails, if they have to exist at all, should be the exception in the Fells. Trails that restrict user types should be few and far between. They should be located off the beaten path, in areas where traffic is already low, and where a single user trail won't be detracting from other users' experiences.

A agree that overall, trail conditions in the Fells are very good. Most problem areas could "easily" be fixed with a little proper trail maintenance. I agree that while the Fells is filled with nature, the Fells is also an urban park used for recreation. You need to preserve nature but you also need to allow recreation.

Trail maintenance is a big issue in the Fells, in my opinion. A trail watch/trail ambassador type program is a good idea. A system where the 'powers that be' could be notified of problem areas immediately would be very effective. Nothing is more frustrating than when you come across a fallen tree in the Fells and you have no one to tell.

As previously stated, there are lots of areas in the Fells that need maintenance. As recreating in general becomes more and more popular, and as the population in Greater Boston increases, so too will the amount of traffic on trails in the Fells. Trail work in the Fells needs to be well planned, organized, and coordinated. It is pointless for NEMBA to hold trail work days, where they keep fixing up the same old sections of the mountain bike loop. Clearly they need to change their methods. But much trail work from hiking groups is downright damaging. Lining the high and low sides of a trail with logs and rocks, in an attempt to keep the trail narrow, end up turning the trail into a gully every time it rains. And bye bye goes the trail. Or recently, some group dug gullies every 100 feet or so along the entire loop of the Reservoir (Orange) Trail. This was done regardless of the conditions of the trail in the area. It was done as more of a construction project than trail maintenance. The vast majority of these ditches were unnecessary, or detrimental to the tread of the trail.

The point of all this is that, there needs to be organization and communication. Trail work in the Fells needs to all be working towards the same goals. Those goals need to be worked out and mutually agreed-upon. Then the massive pool of trail users wanting to give back, can be tapped to accomplish all of the trail maintenance goals. I think nearly all of the problem trail areas in the Fells could be fixed in just a few short years, if system for organizing, coordinating, and executing trail maintenance was put into place.

Another important point is that while there are a few groups involved (FoF, NEMBA, AMC), the vast majority of Fells users are not associated with any of these groups. These 'regular folk' need to be involved in the process too. Trail work shouldn't just be "well FoF is in charge of this trail and NEMBA is in charge of that trail".

One final note about trail maintenance in the Fells. With so many trails switching, or potentially switching over to multi-use, hiking groups should no longer be allowed to build stone staircases in the middle of singletrack trails, effective immediately. I personally feel like a stone stair case's primary purpose is to antagonized bicycles anyway. But regardless, for multi-use trails, traditional rock armoring and/or practical re-routing is the proper solution. Stone staircases are a metaphor for the wedge being driven between user groups in the Fells.

I feel that the DCR's official stance that hiking, biking and trail running all have a similar impact is 100% correct. I also think it's a great idea to change the generic "winter ban" on mountain biking, to a mud season ban that adapts to trail conditions. HOWEVER these two ideas lead to the painfully obvious question. If bikers and hikers and runners all have similar trail impact, why is the mud ban only for bikes? The mud ban should absolutely apply to ALL trail users.

One way to make this winter/mud ban more practical, may be to have it apply only to singletrack, while leaving fire roads open to trail users year-round. Executing this would be a challenge but I believe it could be done effectively.

One last thought on the mud ban is that some ground rules should be put into place, on how the decision is made when to open and when to close. I wouldn't want one particular group, like the FoF, pushing for a trail closure in the Fells every time a dark cloud rolls along. It needs to be a mud-season ban, not a rainy day ban.

The words "fun" and "technical challenge" in the DCR's draft plan are used as words that describe biker's needs as being different from hiker. But that's very disingenuous. I think anyone that hikes or bikes or runs on a trail like the Skyline trail, are seeking the exact same thing, "fun" and "technical challenge". Hikers and Bikers seek essentially the same thing out of a trail, and I think those words in the draft plan 'mislead' the reader into thinking bikes are somehow different.

I think a "no net gain" policy on trail planning is too general. There are many areas in the Fells that have too many trails and could benefit from a reduction (areas of "spider web" trails). There are also many areas of the Fells that have few trails and little traffic, and could benefit from some trail expansion. I think each area of the Fells should be judged on it's own properties and conditions, and not be held to a generic rule like 'no net gain'.

Very relevant to my above point, I think that separating overlapping trails is an excellent idea (the idea DID come from my FellsBiker proposal after all). The goal should be to have each trail be it's own unique experience. The Reservoir and Skyline trail overlap a lot, as does the Skyline and Cross Fells. The Cross Fells also has significant fire road overlap. All of those trails could be separated. This would have a net gain of trail distance, but the trails could be well planed and sustainable. This would, in my opinion, improve everyone's trail experience. Removing overlap would also make the trails even easier to follow, reducing the amount of people getting lose.

I also like the idea mentioned in the Draft Plan, of completing a loop around Spot Pond. That would be a nice trail, and could possibly be joined with the Cross Fells trail, to turn the Cross Fells trail into a loop, instead of a straight-line trail.

Bikers are not getting, or even requesting, any biker-only trails. Why do hikers get hiker-only trails? I don't think there should be any hiking-only trails in the Fells. However if hiking-only trails have to happen, they should be placed in secluded, low traffic areas of the Fells where there existence won't detract from the trail experience of other users.

For example, the Rock Circuit Trail and the Lawrence Woods area, are both located in what you might call the "far corners" of the Fells. Either of those areas would be a much more appropriate place for a hiker-only trail, than the Skyline trail. The rock circuit is an amazingly fun and challenging trail, for hikers and bikers. I don't want it to be hiker-only. But it would be a much more logical trail than the Skyline trail.

The Virginia Wood is completely inappropriate as a pedestrian only parcel of land. I see no reason or arguments explaining why an entire parcel even needs to be hiker-only. But a parcel like that makes no sense. Anybody who is doing a completely loop of the Fells, has to travel through the virginia wood. Expecting people to travel 90% of the way around the Fells, get to the Virginia Wood, and turn around and go back the way they came is completely unrealistic. This makes no sense whatsoever. Setting up a parcel of land like that is just setting up bikers to fail, when it comes to following this new policy.

Adding/improving parking areas like Fallon Road, and the old Hospital, is a great idea. Also adding some official off-leash areas is also a good idea. I don't think turning the whole woods into an off-leash area is appropriate, but there should definitely be some areas.

I don't think the idea of separate trail use by day and/or times is a good idea. The idea of having, for example, the Skyline trail be for hikers only on the weekends and bikers on weekdays. That seems to cross a line of complexity, that makes the rules of the Fells too difficult to enforce and too complicated for the casual trail users to remember, or even be aware of. I think the only rule that should be time-flexible is the mud ban, which should be extended or shortened as necessary (and applied to all trail users).

The last point I want to bring up is the idea of self-enforcement. Self-enforcement and education can go a long way in the Fells. There are a whole network of Fells-related websites that can get information out to a huge number of Fells users. But Self-enforcement and education will only be effective if the rules that are being learned, and enforced, are fair. If the rules are biased, self-enforcement will be as effective as it is right \*now\* in the Fells.

Thank you for your efforts, DCR. I eagerly await the next step in this process.

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