

Summary of Public Comment on the Fells Draft Trail Plan and DCR Response

The Department of Conservation and Recreation received an incredible 2,562 public comments from over 2,400 individuals via email, letter and phone regarding the Draft Middlesex Fells Trail System Plan, evidence of vigorous public interest in the future of the Fells. These comments are posted at

<http://www.mass.gov/dcr/news/publicmeetings/greenwaysfellsplast.htm>

We are gratified by the level of public interest and participation that these comments represent. Letters were received by neighbors to the reservation, users of the Fells, local environmental and user organizations, and state-wide environmental and user organizations.

Below we have attempted to summarize some of the main themes that the comments represent and also provide a DCR response to these comments.

Support for the Trail Plan and its implementation

The vast majority of comments received (roughly 2,100 of the 2,562) expressed support for the Trail Plan and its immediate implementation. Nearly all of these (1,936) were received as a form letter e-mail.

Support for multiple use (mountain biking) accommodations

In addition to general support for the plan and its implementation, the letters referenced above also expressed

- Support for expanding mountain biking opportunities at the Fells
- Support for designating trails as multi-use
- Support for a month of March trail closure applying to all users
- Disagreement with keeping the Skyline Trail as hiking-only
- Disagreement with designating Virginia Woods as pedestrian only
- Disagreement with the concept of exploring different uses by different days or times

DCR Response:

DCR appreciates the level of support for the Trail Plan expressed by these comments. DCR reaffirms that mountain biking is a suitable recreational use in the Fells and that properly managed mountain biking is compatible with the natural and cultural values of the reservation even on single track trails. We believe that mountain biking can be enhanced in the Fells, including on single-track trails, but because of the level public disagreement about the subject, and the call for a Resource Management Plan to be

completed first, we will not be designating any new trails for mountain biking use at this time.

DCR does not believe that it is appropriate to designate all trails at the Fells for multiple use. It is clear at the Fells that many users desire to find a recreational experience that does not include encountering bikes. It is also clear that many users perceive that mountain bikes pose safety concerns, especially on narrow trails. DCR is therefore committed to continuing to provide quality hiking-only experiences at the Fells on trails like the Skyline and the Rock Circuit, and potentially in a specific geographic area. We will continue to explore this possibility in the Resource Management Plan.

No comments expressed support for designating Virginia Woods as pedestrian only. Therefore, it is unlikely that we will include this recommendation in the final plan.

No comments supported the idea of separating pedestrian and mountain bike use by days or times. Therefore, it is unlikely that we will include this recommendation in the final plan.

Desire not to expand mountain biking use at the Fells

The second largest number of comments received (roughly 350) opposed an expansion of mountain biking at the Fells or designating additional trails to include mountain biking use. These comments were often coupled with the next comment regarding a Resource Management Plan. Sentiments expressed in these comments include:

- Opposition to allowing mountain bikes in the Fells
- Opposition to expanding any legal mountain biking access in the Fells
- A concern that mountain bike use is damaging to the natural environment of the Fells including causing erosion, impacting wetlands, damaging plants and disturbing wildlife
- A concern that encountering mountain bikes can impact another users enjoyment of nature and sense of solitude
- A concern that mountain bikes pose safety hazard to some other users, especially children and the elderly

DCR Response:

DCR recognizes that there is significant disagreement by different members of the public about the presence and role of mountain bikes at the Fells. However, DCR reaffirms that mountain biking is a suitable recreational use in the Fells and that properly managed mountain biking is compatible with the natural and cultural values

of the reservation even on single track trails. We believe that mountain biking can be enhanced in the Fells, including on single-track trails, but because of the level public disagreement about the subject, and the call for a Resource Management Plan to be completed first, we will not be designating any new trails for mountain biking use at this time.

Some commenters appeared to misread or misinterpret the recommendations of the plan asserting that it “converts the majority of hiking trails at the reservation into bike trails” or calls for a “significant increase in bike use.” Neither of these statements is true. The Trail Plan does not call for any increase in any use at the Fells reservation. Relative to bike use, it proposes re-designating 2-4 trails to allow mountain bike use, closing off other currently open trails to bike use and better enforcing “no biking on hiking-only trails.” In total, this would represent a decrease in current levels of bike use.

Although a number of comments stated that mountain bikes damage the natural environment of the Fells, this is not supported by DCR’s evaluation of the trail conditions at the reservation or by the body of scientific literature in the field of recreational ecology (see appendix E of the Trail Plan for a further discussion). Cessford (2002)* provides a particularly useful discussion of the perceptions of environmental impact attributed to biking versus the studies of actual impact. He states “like any outdoor recreationists, riders will have impacts on the environment, including soils, vegetation, water and wildlife. But because most walkers and riders stay on tracks, wider environmental consequences are minimal because the direct physical effects are generally confined to the track surface.” Although tire tracks in soft earth left by bikes are visually distinctive, they are not evidence of broader environmental impacts such as erosion or vegetation trampling. Cessford notes “the usual perception is that biking has disproportionately higher impacts on tracks than does walking. However, when the comparative effects of different recreation activities have been investigated, the real differences identified do not conform to these perceptions.”

Many comments expressed users’ desire to experience solitude and commented that encountering bikes impacted that experience. DCR reaffirms the finding of the Trail Plan that users can find solitude in the Fells in certain areas and at certain times and seasons, and that this is an important recreational experience offered at the Fells. However, we also reaffirm that finding solitude at all locations and times cannot be an expectation of users. DCR is committed to continuing to provide experiences during which users can find moments of solitude. We will continue to explore this in the Resource Management Plan.

Many commenters expressed the opinion that bikes pose a safety hazard and several users note that they have had to “jump out of the way from fast moving bikers.” It is important to note that the Trail Plan did specifically consider the safety impacts of mountain biking at the reservation. While DCR does receive reports of people having to move out of the way to avoid bikes, Fells incident records do not include any reports of actual accidents involving bikers and walkers. This is also consistent with findings that Cessford reports from other protected areas around that world that allow biking and hiking. In the five studies that Cessford cites, bike-walker accidents were found to be nonexistent or minimal. He summarizes by noting that “while it does appear that actual safety hazards are over-estimated by walkers, it seems clear that some will feel uncomfortable knowing that bikes may be present whether a real hazard exists or not.” As a result, we are committed to continuing to provide quality hiking-only experiences at the Fells on trails like the Skyline and the Rock Circuit, and potentially in a specific geographic area so that users can find trails where they will not encounter bikes. DCR is also committed to enhancing enforcement of “no biking on hiking-only trails” and working with users to enhance trail etiquette and self-enforcement.

Call for no changes in trail usage prior to completion of a Resource Management Plan

As noted above, many (roughly 350) of the comments requested that DCR make no changes in trail usage prior to the completion of a Resource Management Plan (RMP).

DCR Response:

DCR celebrates the history of the Fells, and the recreational, ecological and cultural values that the reservation preserves. We acknowledge a significant public interest in completing an RMP which will describe and document the full natural, cultural, management and historic profile of the reservation and its management for all appropriate uses. As a result, we are launching the RMP process now, and will soon be announcing a series of meetings and workshops to further engage the public in the plan. We will also not be designating any new trail uses or changing any trail use designations at this time.

Comments relative to off-leash dogs at the Fells

DCR received relatively few comments related to off-leash dogs at the reservation. Approximately, ten individuals supported the concept of an official off-leash designated area at the Sheepfold recommended by the plan. Approximately seven individuals requested consideration of off-leash trail opportunities, and roughly the same number expressed concern about off-leash dogs at the reservation.

DCR Response:

DCR was somewhat surprised by the small number of comments related to dogs given the number of dog owners at the Fells and the outreach to dog-owner groups. Beginning this spring, DCR will be allowing off-leash dogs only in a designated area at the sheepfold, and better enforcing the leash laws elsewhere. We expect to work with dog-owner groups to help us develop education and self-enforcement programs. We will continue to explore the idea of designated off-leash trails or areas in the RMP.

Comments in support of orienteering

Roughly 20 comments were received in support of the activity of orienteering as both an on-trail and off-trail use at the Fells reservation. These comments generally requested that orienteering be acknowledged as a use of the Fells in Section 2 of the plan, that orienteering clubs be included in the list of stewardship partners in Section 5 and the language be included that allows orienteering at the Fells as an allowed off-trail use with the appropriate permits.

DCR Response:

DCR agrees with these comments and will revise the final Trail Plan as suggested.

Comments related to cross-country skiing at the Fells

We received a few comments in support of cross-country skiing at the Fells, requesting provisions for skiing-only trails, and educating other users as to the impacts that boots and tires can have on ski tracks.

DCR Response:

DCR agrees with these comments and will revise the final Trail Plan as suggested.

* Cessford, G.R. 2002. Perception and Reality of Conflict: Walkers and Mountain Bikes on the Queen Charlotte Track in New Zealand.