



Advocacy Department

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February 7, 2011

Paul Cavanagh
Department of Conservation & Recreation
Southeast Region Headquarters
194 Cranberry Road
South Carver, MA 02366

Re: **Draft Resource Management Plan for Blue Hills Planning Unit (including Blue Hills Reservation, Ponkapoag Golf Course, and Town Brook Flood Control Site)**

Via Email: rmp.comments@state.ma.us

Dear Mr. Cavanagh:

On behalf of Mass Audubon, I submit the following comments on the draft Resource Management Plan (RMP) for the Blue Hills Planning Unit. Since 1974, Mass Audubon has partnered with the Commonwealth at the Blue Hills Reservation in managing the Trailside Museum. We are committed to continuing to work with the Department of Conservation and Recreation (DCR) to promote knowledge, appreciation and stewardship of the Reservation.

At 6,116 acres, the Blue Hills Reservation is one of DCR's largest properties. It contains a wide array of natural and cultural resources, and supports a diversity of natural community types ranging from dry Ridgetop Pitch Pine/Scrub Oak to Atlantic White Cedar Bog and a variety of woodland and wetland habitats in between. Five of the community types are considered rare (state rank S2 or S3). At least 18 state-listed rare or endangered species are known to exist on the Reservation, and approximately 75% of the land is mapped by the Natural Heritage and Endangered Species Program as Priority Habitat for rare species. There are 55 certified vernal pools and more than 30 additional potential vernal pools that have not been documented for certification. More than 650 species of plants have been recorded on or near the Reservation. Mass Audubon has designated the Blue Hills Reservation as an Important Bird Area (IBA) [http://www.massaudubon.org/Birds and Birding/IBAs/site_summary.php?getsite=43](http://www.massaudubon.org/Birds_and_Birding/IBAs/site_summary.php?getsite=43).

The Blue Hills is also a popular urban parkland, utilized for a wide range of recreational activities. The Reservation can support many different recreational uses, although not every portion of the property can support every use. Mass Audubon supports the *Guiding Principles for Stewardship* in the draft RMP, which set the stage for sustainable use and appreciation of the Reservation while providing for protection of sensitive resources. The plan also recognizes potential threats from external pressures such as development around the park's perimeter and the spread of invasive species.

The draft plan includes 186 recommendations, of which 18 are identified as high or medium priority recommendations that can be implemented given available resources. This illustrates the challenges DCR faces in managing its lands for the benefit of current and future generations. Partnerships with nonprofit and community organizations, the Friends of the Blue Hills, user groups, and citizen volunteers are essential in light of limited staff and funding. Even with such partnerships, the work needed to study, monitor, protect and restore resources while providing safe and adequate access for the full range of recreational uses is a daunting challenge. DCR should carefully consider its capacity to manage existing uses when considering expansion of activities. The presence of extensive areas of Priority Habitat and wetlands on the site also requires that all projects be reviewed to ensure compliance with the Massachusetts Endangered Species Act and/or Wetlands Protection Act where applicable.

In conclusion, Mass Audubon thanks DCR for undertaking this RMP process for the Blue Hills Reservation. We encourage DCR to apply the RMP as a living document, to incorporate new information and address resource protection or recreational management needs, with public input. Mass Audubon values its partnership with DCR at the Blue Hills. We look forward to continuing to assist the agency with resource documentation and stewardship and in promoting an ever growing appreciation of the natural values of this special property to people of all ages and backgrounds.

Thank you for the opportunity to comment.

Sincerely,



John J. Clarke
Director of Public Policy & Government Relations

cc: DCR Commissioner Edward Lambert
Joseph Orfant, Division of Planning and Engineering
Friends of the Blue Hills