



Advocacy Department

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November 14, 2011

Fells RMP Comments
Department of Conservation and Recreation (DCR)
136 Damon Road
Northampton, MA, 01060

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

Re: **Middlesex Fells Reservation Draft Resource Management Plan**

Dear DCR Resource Management Planning staff:

On behalf of Mass Audubon, I submit the following comments on the draft Resource Management (RMP) for the Middlesex Fells Reservation. We appreciate DCR making the RMP planning process for the Fells a priority, and for including Mass Audubon in the planning process. The RMP outlines adequate goals for management of the Reservation, but notes significant shortfalls in DCR capacity to implement associated management recommendations. Mass Audubon recommends that DCR focus limited resources on education and enforcement to curtail ongoing damage to sensitive resources.

Natural Resources of the Middlesex Fells

The RMP confirms that the 2,575-acre Middlesex Fells Reservation contains numerous high value conservation resources, including BioMap 2 Core Habitat, Priority Habitat for 10 state-listed rare plants, 129 vernal pools (including an area of Vernal Pool Core Habitat which represents areas with the highest percent most interconnected clusters of vernal pools statewide, with surrounding uplands), 560 species of native vascular plants including 10 Watch-listed species, 5 Priority Natural Communities (including sugar maple-oak-hickory forest – one of only 3 occurrences in eastern Massachusetts), 183 bird species (27 of which are in greatest need of conservation according to MassWildlife), 21 mammals, 10 amphibians, and 7 reptiles. The Fells is also an Important Bird Area. Two species of ground-nesting birds in greatest need of conservation that breed in the Reservation, the Eastern Towhee and American Woodcock are particularly vulnerable to recreational impacts. The RMP includes substantial information on these resources and their management needs, including a rare species management plan. Appendix 1 of the RMP acknowledges the role of qualified volunteers in documenting natural resources of the Fells including plants and vernal pools, and supplemented that information by hiring independent consultants to conduct field studies. Those studies confirmed much of what was already known about the Fells and found additional species and habitats that had not been previously documented. Considering the scope and timeframe available for those studies, it is likely that the Reservation also contains additional resources that remain to be discovered.
