



March 20, 2003

Doug Foy, Chief of Commonwealth Development
Office of the Governor
State House, Room 360
Boston, MA 02133

Ellen Roy Herzfelder, Secretary of Environmental Affairs
Executive Office of Environmental Affairs
251 Causeway Street, 9th floor
Boston, MA 02114

Dear Chief Foy and Secretary Herzfelder:

Massachusetts is fortunate to possess a stunning array of public lands encompassing a vast wealth of natural resources and public recreation opportunities. Stewardship of these public trust resources is a core function of state government, as established in Article 97 of the State Constitution.

The proposed reorganization of state government offers an opportunity to reaffirm the commonwealth's commitment to excellence in stewardship of public parks and forestlands. At the same time, there may well be opportunities for improved efficiencies in management and operations. We offer the following suggestions and guiding principles for your consideration in support of the Romney Administration's goal of providing a world-class parks system. We also offer some examples of "low-hanging fruit" -- opportunities to save money and focus the parks' agencies resources on work most central to its core mission.

Guiding Principles/Key Recommendations

Public trust stewardship: The overriding mission of the parks management agency must continue to be stewardship of public lands to enhance and protect public values: natural resources, water, wildlife, and compatible recreation.

Management Planning: Management plans should be developed for every property, informed by a statewide understanding of resources and needs. Public input and participation should be built into the planning process. No management actions impacting natural resources, such as timber cutting, should be undertaken unless justified and consistent with a comprehensive site management plan developed with public involvement.

Adequate Staffing and Funding for Core Functions: The parks agency must be provided with adequate funding and professional staffing to undertake responsible land stewardship, ongoing maintenance and operations, and diligent enforcement of environmental laws.

Public Involvement and Oversight: Citizens and public interest groups should be engaged as active partners in forests and parks planning and management. A policy of openness, information sharing, and transparency in decision-making should be adopted. A statewide independent oversight board comparable to the existing Board of Environmental Management should be maintained with broad authority regarding policy setting and land management plan approvals. Citizens Advisory Committees and Friends groups should be formed and empowered to assist the agency with planning and management.

Opportunities to Focus on Core Mission and Save Money

We offer the following examples of situations where the Department of Environmental Management's (DEM) resources have been expended on projects contrary or unrelated to the agency's land stewardship mandate. We hope that our criticism of these items will be taken in the spirit in which they are intended – to help avoid future similar situations and focus the parks agency's limited resources on fulfilling its core mission. There remains opportunity for cost-savings in these three items as examples of “low-hanging fruit” ripe for demonstrating a commitment to natural resources stewardship in a first-class park system.

Greylock Glen: The legislature charged the DEM, through Chapter 626 of the Acts of 1985, with acquiring and developing Greylock Glen. The Glen is located at the base of the state's highest peak, Mount Greylock. The Mount Greylock State Reservation is one of the state's largest and oldest public reservations. DEM has expended over \$5 million dollars on the Glen project, of which only about \$325,000 was for land acquisition. Two large development projects were proposed in succession, both of which were ultimately abandoned due to inconsistencies with the original enabling legislation. The proposals were out of scale with the sensitivity of the site and did not meet the original intentions for supporting the local economy. The Swift Administration wisely halted the project and shifted the focus to efforts by MassDevelopment to assist the Town of North Adams with downtown development and tourism. In retrospect, the project was fundamentally flawed from the beginning in that it is inappropriate to charge a parks agency with undertaking a major economic development project. We urge the Romney Administration to continue with the present focus of MassDevelopment on downtown revitalization in North Adams, consider annexing all or part of the Glen to the Reservation, and avoid burdening the new, reorganized parks agency with economic development projects that lie outside the core mission of land stewardship.

Myles Standish State Forest, the Commonwealth's third largest property, hosts globally significant coastal plain and kettle-hole habitats, and lies at the core of the state's largest remaining pine barren forest. In 1995, after a nearly four-year policy review, DEM determined high-impact off-road vehicle (ORV) use was not compatible with the forest's unique natural resources, and closed the existing ORV trails. Unfortunately, illegal ORV use continues to this day. Despite extensive review and the subsequent ruling, DEM has been pressured by ORV users and legislators to reintroduce ORV use. DEM's limited resources have been squandered – expending over \$180,000 on consultants in an attempt to accommodate this special interest use – despite the property's other urgent management needs including adequate enforcement to stop illegal ORV riding. DEM should discontinue any efforts to reintroduce ORV use on this property. Also, DEM should complete an up-to-date management plan. DEM should also aggressively seek federal and other funding to assist with fire protection programs to reduce fire hazards on and around Myles Standish and to conduct prescribed burns and thinning to advance goals of fire hazard reduction and ecological management.

Wachusett Mountain State Reservation in central Massachusetts is one of the state's most heavily visited parks, with one million visitors per year. The park contains two often competing features: a 220-acre old-growth forest near the summit and a 450 acre area leased to a commercial ski company, Wachusett

Mountain Associates (WMA). The forest is hailed by scientists for its special features and research value, and treasured by the public as a rare example of the Commonwealth's pre-colonial forest landscape. The ski company has twice sought to expand its trail system. The first expansion, in the mid-1980s, unknowingly destroyed and fragmented much of the old-growth forest, and WMA again recently proposed to expand the highly profitable ski facility. Despite intense public opposition and the fact that the ski area has already well exceeded the established build-out limits for the facility, DEM approved WMA's proposal to clear-cut a 140-year old mature Northern Red Oak forest. This expansion would destroy biologically diverse habitat in DEM's designated old-growth buffer zone, and place more of the park "off-limits" to hikers and other passive recreational users of the park.

Management decisions should be driven by stewardship plans that protect irreplaceable resources for present and future generations, not by private companies lobbying for high-impact intensive development on our public lands. WMA has expanded its operations and income time and time again, while staffing, research, and management promised in the DEM management plan languishes due to inadequate funding. Meanwhile, DEM has expended untold amounts of staff time and legal expenses advancing the expansion of this private company. No further expansions should be allowed and WMA should be required to fully compensate the state for all costs associated with oversight, management, monitoring, and enforcement associated with the ski area.

Conclusion

These examples illustrate the pressures, distractions, and costs that are incurred when a state parks agency is diverted from its primary mission by special private interests. We urge you to reaffirm the core mission of land stewardship and public trust protection in undertaking reorganization of the agencies responsible for public lands management. We hope that the suggested principles and actions described above will assist you in achieving the Governor's goal of establishing a world-class state park system.

Sincerely,

John J. Clarke, Director of Advocacy
Mass Audubon
208 South Great Road
Lincoln, MA 01773

Nancy Goodman, Research Director
Environmental League of Massachusetts
14 Beacon Street, Suite 714
Boston, MA 02108



James McCaffrey, Executive Director
Massachusetts Sierra Club
100 Boylston Street
Boston, MA 02116

Iris Vicencio-Garaygay, Environmental Advocate
MASSPIRG
29 Temple Place
Boston, MA 02111

Amy McNamara, Land Conservation Advocate
Appalachian Mountain Club
5 Joy Street
Boston, MA 02108

Attachment: Our Forests and Parks in Crisis report