



August 25, 2011

Edward M. Lambert, Jr., Commissioner  
Department of Conservation and Recreation  
251 Causeway St, Suite 600  
Boston, MA 02114-2104

Re: **DCR Draft Landscape Designations and Management Guidelines**

Via Email: [designation.comments@state.ma.us](mailto:designation.comments@state.ma.us)

Dear Commissioner Lambert:

On behalf of the Environmental League of Massachusetts, Charles River Watershed Association, Massachusetts Association of Conservation Commissions, Mass Audubon, and Massachusetts Chapter of the Sierra Club, we submit the following comments on the Department of Conservation and Recreation (DCR) draft Landscape Designations and Management Guidelines. As you know, we support the recommendations of the Forest Vision Technical Steering Committee (TSC). We are pleased to see DCR moving forward with implementation, and offer these comments highlighting areas where the final Designations and Management Guidelines could be clarified to ensure that key TSC recommendations are applied. In particular, it is important that the final Designations protect habitat for both common and rare species, consistent with the TSC recommendation on Patch Reserves. The planning framework and public input processes for alterations to natural areas, whether for forestry, recreation, or habitat management also need to be very clear and unambiguous.

DCR is the single most significant landowner for conservation across the commonwealth. Not only does it own more land than any other entity, these lands are of tremendous significance, including habitat for nearly 300 state listed rare species as well as countless more common species and numerous cultural and historic features. DCR lands encompass an amazing array of landscapes from ocean beaches to the highest peak in the state, and dozens of natural community types in between including many of the largest remaining blocks of forest in the commonwealth. As the TSC recognized, these public lands provide important ecosystem services, including functions and values that are not readily provided on private lands. It is important that the natural and cultural resources of DCR lands be protected for future generations on all three categories of Landscape Designations – Reserves, Parklands, and Woodlands.

While we support DCR's efforts to implement the Forest Vision, there are two key aspects of the TSC recommendations that are not adequately addressed in the draft Designations. These should be clarified in the final version:

1. **Large and Patch Reserves:** The TSC recommended that the Reserve designation be applied to the largest, most intact forest blocks within each ecological setting statewide, and that smaller Patch Reserves be designated within Parklands and Woodlands. The TSC supported a target of a minimum of 15,000 acres per large Reserve, but recognized that this goal could not be met in many places under current DCR land ownership. They recommended that DCR establish its existing large blocks of forest as Reserves and work with other agencies and nonprofits to protect additional land around those sites. In parts of the state where existing development makes the 15,000 acre goal impossible, BioMap provides information on the most intact areas of landscape important for conservation.

The TSC also recommended designation of an expansive network of smaller Patch Reserves to complement the large Reserves. These small Reserves are to be designated within the Woodlands and Parklands designations.

The proposed Designations do not include several of the largest DCR landholdings in the Large Reserves, and instead include a dozen areas under 1,000 acres in size. DCR has indicated that it will address the Patch Reserve concept through site-specific Zone 1 areas to be designated in future Resource Management Plans (RMPs). However, the current definition of Zone 1 does not appear to be expansive enough to address the full range of ecosystem services the TSC intended for Patch Reserves, and the Management Guidelines leave the door open to potential alterations to these sites before the RMPs are completed.

2. **Unification of planning framework, with clarity and transparency in public participation processes.** A major theme of the TSC report was the need for a clear framework for decision making on land stewardship that is open and transparent and includes public knowledge and concerns regarding local resources. The proposed management guidelines do not adequately reconcile DCR's planning frameworks and guidance documents, including the Landscape Designations and Land Stewardship Zoning Guidelines for RMPs, forestry RMPs, forestry guidelines, trail guidelines, etc. In particular, further clarification is needed on:
- Definition of what can happen on the ground in terms of new trails, forestry, or recreation facilities prior to an RMP;
  - Public participation procedures for new trails, facilities, or forestry; and
  - How DCR will ensure that the entire planning framework will be officially tied to MGL Ch. 21 S. 2F in order to ensure that the new designations have legal authority and some permanence.

The final Designations can address these concerns by refining the Reserve designations to better reconcile them with the most intact portions of the landscape statewide (BioMap 2 Core Habitats and Critical Natural Landscapes); clarifying the definition of Zone 1 to include smaller yet significant intact landscape important for both common and rare species; and clarifying the planning and public input processes that will be undertaken before any significant alterations occur on the ground. Given budgetary constraints, we recommend that DCR focus its limited resources primarily on maintaining the trails and facilities it presently has, and proceed cautiously and transparently on new projects to build public support for the agency's work.

In conclusion, we want to thank DCR for its commitment to follow through on the Forest Vision. We remain committed to working with DCR in implementing the TSC recommendations.

Sincerely,



Nancy Goodman  
Vice President for Policy  
Environmental League of Massachusetts



E. Heidi Ricci  
Senior Policy Analyst  
Mass Audubon



Margaret Van Deusen  
Deputy Director and General Counsel  
Charles River Watershed Association



James McCaffrey  
Director  
Massachusetts Chapter of the Sierra Club



Linda Orel  
Executive Director  
Massachusetts Association of Conservation Commissions