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Gary Briere
Massachusetts Forests & Parks
PO Box 484
Amherst MA 01004

April 22, 2004

RE: Protection of Trail Resources during DCR-approved Forestry Operations

Dear Gary,

NEMBA believes and supports the use of forestry as a management tool for the preservation of our forests and parks. However, we strongly believe that the current forestry guidelines lack adequate protections for one of the DCR's greatest assets: trails. Trails should not be considered an amenity. Fundamentally, trails are the critical means to protect natural resources while allowing public access. The DCR's current guidelines jeopardize trail resources.

NEMBA urges the DCR to evaluate two aspects of its forestry operations, and implement the following:

- 1) Create buffer zones that protect trails and trail systems from forestry operations**
- 2) Require greater communication and supervision between forestry operations and park supervisors and regional supervisors**

Trail Buffer Zone:

We believe that all trails on DCR properties should be protected from forestry operations by a minimum of 100 feet. This buffer zone would serve two important purposes. First, it would protect the natural experiences that trail users seek when using DCR property. Second, and more importantly, it will protect the trail's viability. In the past, forestry operations have destroyed the existence of trails, or have rendered them impassable due to the operations of trucks and skidders. The refuse left behind has also obliterated and obscured the trail's location.

The 100 foot buffer is a minimum. There are other cases, such as trails of significant importance (recreationally and historically) where the buffer should be considerably greater. Major trails that form part of a park's core loop system should have a buffer of roughly 250', while nationally recognized trails (such as the Appalachian trail, the MMM Trail and the Metacomet Trail) should have buffers up to a 500' buffer.

Communication between Foresters, Private Logging Companies and DCR Supervisors

The recent forestry activities at the Holyoke Skinner State Park caught both the park and regional supervisor off guard. There appears to have been little communication and no specific review of the cutting plan in the months prior to this operation. NEMBA urges the DCR to create communication protocols and safeguards that requires park and regional supervisors to review the cutting plan and require site visits before any cutting takes place. Contracts with private logging companies should specify site visits and review by both park and regional supervisors.

Sincerely,

Philip Keyes
Executive Director

CC/ Kathy Abbott

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