Dear Secretary Beaton and Acting Commissioner Sieger,

I’m writing on behalf of the New England Mountain Bike Association, whose 5,000 members in 27 chapters throughout New England volunteer thousands of hours every year working with land managers to provide sustainable trails for all non-motorized trail users. We are very concerned about the public access problem faced primarily by mountain bikers in the Ware River Watershed in central Massachusetts. Central Massachusetts is unique in the state as having a limited amount of publicly-accessible trails available for mountain biking.

Attached is our proposal for improved public access to the Watershed as well as a one-page fact sheet to clarify some of the issues. We believe that adopting this proposal would be in the best interests of the Commonwealth, the MWRA, and the citizens in the communities surrounding the Watershed. We believe the Watershed is an important public open-space resource that can, and should, play a part in balanced outdoor recreation opportunities for residents in the central part of the state.

There exists an official process for the DCR-DWSP to consider changes to their public access plan. While we will be submitting our proposal through that process, it is very important to note that DWSP representatives have informed mountain bikers in no uncertain terms at the May 2015 meeting of the Ware River Watershed Advisory Committee that they will not change their policy on mountain biking voluntarily and that such change could only come about through intervention from Governor Baker, Secretary Beaton, or, at that time, Commissioner Sanchez.

DWSP prohibited mountain biking in 1994 in between the official 1988 and 2000 Public Access Plans. The rule change saw no public involvement or public discussion. However, mountain biking continued on the property and the DWSP staff did not appear to have any real issue with it until August 2014, when the DWSP decided to invest significant resources to eliminate mountain biking from the Watershed. DWSP continues to allow other forms of passive recreation such as hiking, hunting and equestrian use as well as motorized recreation such as snowmobile use. The land also allows extensive logging activities. DCR recognizes mountain biking as a valid form of passive recreation with impacts consistent with hiking activity.

We hope that the new administration will review this issue free from the biases that have mired progress so far. We will continue to advocate for mountain biking within the DWSP’s official process; however, we believe your intervention is necessary given the DWSP’s biases against mountain biking. To be clear, we are not asking for new access, only the legitimization of recreation that was implicitly
allowed for the last 30+ years in the Watershed because it was considered to be, and is, a valid, sustainable form of passive recreation.

Our organization hopes to partner with other groups, such as the newly-formed Friends of the Ware River Watershed and the DWSP to solve these issues and offer responsible stewardship and balanced public access.

We hope you will provide some objective support to this issue. As DWSP is part of DCR, we urge DCR to designate trails open for passive public recreation in the Watershed as "shared-use", meaning open for hiking or mountain biking, consistent with all other recreational trails directly managed by DCR that are designated as shared-use. We look forward to partnering with the agency to develop a pilot project promoting greater mountain bike access and a better trail experience for everyone who enjoys and values the Ware River Watershed.

Respectfully,

Brett Russ
Regional Vice President and Secretary, Wachusett Chapter
New England Mountain Bike Association
NEMBA’s Ware River Watershed Fact Sheet

We urge the DCR to reclassify mountain biking as a legitimate activity on certain trails in the watershed and we look forward to partnering with the agency to develop a pilot project promoting greater mountain bike access and a better trail experience for everyone.

1. Mountain biking has been taking place in the Ware River Watershed (WRW) since the advent of the sport in the early 1980s. Though it has never been classified as a sanctioned recreational activity at WRW, DCR staff and rangers have not regarded it as a problem until recently. The actual problem is unauthorized trail building done by various trail users. NEMBA wishes to work with DCR and others to curb this.

2. The DCR Division of Water Supply Protection (DWSP) does not allow trail access to mountain biking because “Bicycling can cause erosion on trails and be a safety hazard to watershed maintenance operations, active forest harvesting, and public vehicle operation on many DCR roads.” This fear is unfounded; every DCR Resource Management Plan (RMP) that has evaluated mountain bike impacts concluded that the environmental effects are on par with hiking, and hiking is permitted nearly everywhere in the WRW. The Harold Parker State Forest RMP, for example, states: “Due to its low impact nature, mountain biking can be accommodated in most areas of the forests without significantly impacting natural resources. It is a quiet activity that in most cases has minimal impact on breeding animals. However, it should be directed away from more sensitive habitats like vernal pools.” The Middlesex Fells RMP states: “...with respect to environmental impacts, [hiking and mountain biking] have similar impacts and should be evaluated similarly.”

3. While the primary purpose of the watershed is to provide high quality drinking water to 2.5 million users in the Boston area, the DWSP also has a duty and obligation to allow public access and recreation. We need to reconcile the growing central Massachusetts population (at 840 people/mi² MA is 3rd in the country for population density) with the growing WRW (which increased by 9,000 acres in the last 11 years). The citizens deserve a balanced recreational benefit from this asset as long as this benefit does not negatively impact the water supply. It should not simply be a “Greater Boston” asset.

4. The WRW does not contain an open reservoir, such as is the Quabbin. It is 25,000 acres of open space watershed. As such, it is open to all forms of non-motorized recreation in the summer with the addition of snowmobiling in the winter. Mountain biking is the only non-motorized recreation prohibited off road.

5. Given that mountain biking is a low-impact, sustainable form of recreation on par with hiking, it fits perfectly into the DWSP’s guidelines: “Designated DCR owned lands in each watershed are available to the public for limited, low-impact recreational uses such as hiking, fishing, and hunting, when compatible with water supply protection and when conducted in accordance with DCR’s relevant public access policies. Recreation is allowed in areas specifically designated for recreational access. Areas not available for recreation are closed to public access and are typically marked by “No Trespassing” or other posted signs.”

6. DWSP’s team of scientists has not shown any evidence that the activity of mountain biking has caused any decline in water quality. Water quality continues to be high and has even received national awards—this supports our view that the prevalence of mountain biking on the property is not adversely impacting water quality.

7. DWSP argues that the watershed is not a “park” and allowing mountain biking would require more staff to manage recreation. We assert that allowing mountain biking would not require any increase in staff since it has been occurring anyway for 30+ years. The watershed does not need to be classified as a park just because it allows for mountain biking. DWSP’s argument could equally apply to hunters, fishermen, hikers, skiers, equestrians, and snowmobilers who utilize the watershed for recreation.

8. DWSP argues that mountain biking threatens not only water quality but endangered species and flora. This hyperbole becomes even more absurd in light of the widespread logging operations that take place on the property. There may be some trails that are in ecologically sensitive areas but this is a separate issue.

9. The DWSP does not officially acknowledge the existing trail system. They have no official map of the 35+ miles of trails on their property. Yet the trails do exist and many are marked with the old MDC signage. These trails should be reviewed case-by-case and DCR should acknowledge their existence and put them on an official map.
To: Matthew Beaton, Secretary, Executive Office of Energy & Environmental Affairs  
Daniel Sieger, Acting Commissioner, Department of Conservation & Recreation  
Matthew Sisk, Deputy Commissioner, Department of Conservation & Recreation

From: The Wachusett Chapter of the New England Mountain Bike Association

RE: Formal Request to Legitimize and Permit Mountain Bike Access to Select Trails in the Ware River Watershed

The Wachusett Chapter of the New England Mountain Bike Association respectfully requests that the Department of Conservation & Recreation modify its current public access policy in the Ware River Watershed to allow mountain biking on select singletrack trails.

Mountain biking is a form of passive recreation that takes place primarily on unimproved, narrow singletrack trails—the same type of trails that provide desirable hiking experiences. There are more than 35 miles of such singletrack trails in the Ware River Watershed available to pedestrian use, but mountain bikers are not currently allowed on any of them.

Singletrack trail access is important to the residents of communities in and around the Watershed because there are so very few other opportunities for mountain biking outside of this open space. This NEMBA-provided map of valid areas to mountain bike in Massachusetts clearly shows the deficit in central Massachusetts, of which the 25,000 acre Ware River Watershed sits in the middle:

The activity of mountain biking poses no threat to the health of the Watershed nor its water supply. It is well documented in scientific studies that the physical impacts of mountain biking on the environment are commensurate to those of hiking. Conversely, there are no peer-reviewed studies that indicate that the impacts of mountain biking are greater than that of hiking. In fact, DCR’s own resource management plans (RMPs) agree:

- Middlesex Fells RMP: “This RMP concludes that, with respect to environmental impacts, these two recreational uses [hiking and mountain biking] have similar impacts and should be evaluated similarly.”
- Harold Parker SF RMP: “Mountain biking, as with all recreational trail uses, can cause trampling, soil compaction, erosion and sedimentation. The degree of impact is similar to that of hikers (Cessford, 2002).” ... “Due to its low impact nature, mountain biking can be accommodated in most areas of the forests without significantly impacting natural resources. It is a quiet activity that in most cases has minimal impact on breeding animals. However, it should be directed away from more sensitive habitats like vernal pools.”
The management of this large and growing open space for water supply protection does not change the impact assessments mentioned above. If all other non-motorized recreation is permitted off Watershed roads, then there is no reason that mountain biking can not also be accommodated.

The key to mitigating the impacts, especially erosion, caused by pedestrian and mountain biking use is sustainable trail design. To that end, there are many miles of trail in the watershed that are appropriate to both forms of human-powered recreation. It should be noted that trails unsuitable to mountain biking are equally unsuitable to hiking. By that we mean the trail design, or lack thereof, puts the natural resource at risk through erosion or its location within a sensitive area.

We request that the Department of Conservation & Recreation work with NEMBA to evaluate trails appropriate for hiking and mountain biking. In our preliminary trails evaluation, we have created a map of Watershed trails on DWSP managed lands. We’ve placed the trails into three categories: those that are appropriate to both recreational uses in their current condition, those that would be appropriate after further evaluation and remediation, and those needing closure. The map is included as an appendix to this proposal.

NEMBA realizes there are several issues which concern the DCR-DWSP about trails within the Watershed. First and foremost is the concern about unauthorized trail building. Like the DCR, NEMBA does not condone unauthorized trail building and completely understands land manager frustrations about this. It is important not to conflate unauthorized trail building actions of a few with the benign activity of mountain biking enjoyed by many.

Additionally, the DCR-DWSP has expressed concerns that by allowing mountain biking, there would be a need to increase staffing at this Watershed. As mountain biking has peacefully coexisted with all other Watershed recreation over the past 30 years with staffing levels as they have been, we see no reason why this would need to change. DCR, on the rest of its properties, recognizes mountain biking as an allowed recreational activity within its RMP process alongside other permitted activities like hiking. Finally, a Friends of the Ware River Watershed group is currently being formed in order to help steward the trail system.

It should also be noted that there are no water quality issues in the Watershed today. Winning an award for the best tasting water in the country is an impressive achievement on its own but is even more impressive given that passive recreation, including mountain biking, has co-existed on Watershed trails for over 30 years. This proves the point that sensible passive recreation is no threat to water quality.

We urge the DCR to reclassify mountain biking as a legitimate activity on certain trails in the watershed and we look forward to partnering with the agency to develop a pilot project promoting greater mountain bike access and a better trail experience for everyone.