

October 16, 2006

John Monroe
National Park Service
15 State Street
Boston MA 02109-3572

Dear Mr. Monroe:

The Appalachian Mountain Club (AMC) offers the following comments on the Draft Metacomet Monadnock Mattabesett National Scenic Trail Feasibility Study and Environmental Assessment.

Founded in 1876, the Appalachian Mountain Club is the oldest conservation and recreation organization in the nation. With close to 90,000 members in the Northeast and beyond, the nonprofit AMC promotes the protection, enjoyment, and wise use of the mountains, rivers and trails of the Appalachian region. The AMC supports natural resource conservation while encouraging responsible recreation, based on the philosophy that successful, long-term conservation depends upon first-hand enjoyment of the natural environment.

The AMC is headquartered in Boston, MA and the membership is organized into Chapters from Maine to Washington, D.C. Volunteers from the AMC's Berkshire Chapter in western Massachusetts initially constructed the 89-mile Metacomet-Monadnock (M-M) Trail during a span of 15 years starting in 1951, and Berkshire Chapter volunteers continue to maintain and manage it today. This trail comprises the 80-mile Massachusetts portion of the Metacomet Monadnock Mattabesett (MMM) trail system examined in the draft feasibility study. Less than half of the M-M Trail is considered permanently protected for public use, and the trail's protection was identified as a top priority for protection in the State of Massachusetts' "Commonwealth Connections," which presents a greenway vision for Massachusetts.

AMC is pleased by the study's findings that the MMM trail system's attributes and characteristics are worthy of national recognition. As described in the study, the trail offers a direct experience with the classic New England landscape through its ridgelines, geologic resources, and richness of natural communities as well as its vistas of historic towns, working forests, and farms. The trail system's proximity to significant population areas also strengthens its value as a scenic resource and recreational outlet.

Preferred Alternative

The AMC has a strong interest in the study's primary goal of determining the best way to ensure the long-term viability of a continuous trail system. We agree with the study's finding that Alternative 3 is the most feasible alternative for providing the sustained capacity and resources critical to the longevity of this public use trail system. Alternative 3 would designate a newly named, "New England National Scenic Trail" from Long Island Sound to the New Hampshire border, which would include an extension from the existing Mattabesett Trail to Long Island Sound as well as a significant deviation from the existing route in Massachusetts.

Given the relatively little public land in the Belchertown-Leverett area, where there is also significant landowner disinterest in federal involvement in the trail, AMC agrees that Alternative 2, which would simply call for National Scenic Trail designation of the existing trail route, is not a feasible alternative. Alternative 3 also includes the added benefit of extending the trail system to Long Island Sound.

Blueprint for Management

The "Blueprint for Management" is a valuable component of the feasibility study, and AMC supports the concepts it lays out. Its recommendations appear to be responsive to many of the issues and suggestions voiced by landowners, users, trail maintainers, and other stakeholders during the course of the study process. With regard to the Blueprint for Management, AMC offers the following specific comments:

- The recommended Trail Stewardship Council offers an avenue for collaboratively addressing management and protection issues as well as potential user conflicts among many trail stakeholders. Section F (1.a.) states that the Trail Stewardship Council would have advisory powers only, but is vague on who the Council would advise. This section could be clarified, for example, by stating that the Stewardship Council would advise AMC and the Connecticut Forests and Parks Association on issues of trail management and maintenance. AMC and CFPA would continue to be the lead volunteer-based organizations for day-to-day management and maintenance as stated in Section D. Section F of the Blueprint could also more clearly state that the Trail Stewardship Council would advise NPS on the expenditure of federal funds for the Trail, as implied under Section G (2.b.). It is also AMC's hope that the Trail Stewardship Council and its members will actively assist in aspects of trail protection and management as feasible and appropriate, perhaps through the subcommittees encouraged by the Blueprint.
- AMC appreciates the inclusion of recommendations in the Blueprint that are clearly in response to landowners concerns, such as the establishment of a landowner liability fund to pay for legal costs in the event of a lawsuit; clearly maintaining landowners' rights to determine the activities allowed on their property; and only purchasing land or development rights from willing sellers.

Alternative 4, Non-Federal Implementation of the "Blueprint" recommendations without National Scenic Trail designation, would look to other organizations, such as the state

agencies, AMC, and/or CFPA, to carry out the Blueprint. While some of the recommendations could reasonably be implemented by the trail maintaining organizations, other critical recommendations would require increased resources and the focus of an array of trail partners in manner that would only be possible through National Scenic Trail designation and NPS assistance as described in the Blueprint. For example, the AMC Berkshire Chapter currently edits and publishes a guidebook, but only with information for the M-M Trail. The volunteers also complete trail relocations as needed, and recently installed hiker information signs as the trail crosses into private lands. However, maintaining up-to-date landowner contact information and sustained communication with landowners and the broad array of stakeholders is often beyond the means of small, volunteer-based groups and any single entity that has been involved in the MMM trail system to date. The ability to establish mechanisms for enforcing trail policies, consistently resolving disputes, and both creating and acting on opportunities for trail protection would all be more effective with the focused resources and heightened stature that could be provided through National Park Service assistance in implementing the Blueprint through National Scenic Trail designation as described in Section G.

NPS Role

AMC believes that the recommended role of the National Park Service to provide assistance to a Stewardship Council and its member groups without direct ownership of trail lands is appropriate and would strike the right balance to support the long-term viability of the trail system. AMC is also committed to the recommendation that no segment of the proposed “New England National Scenic Trail” be recognized as such against the wishes of the landowner. The recommended role for the National Park Service would carry the benefit of retaining the history of partnership and local collaboration in building and maintaining the trail, while also providing a critical boost to local capacity and establishing continuity across a nationally significant trail system through financial and administrative assistance.

Future of M-M Trail Current Route

AMC supports the study’s recommended Alternative 3, including a significant deviation from the current route in Massachusetts, yet also recognizes local community interest in retaining the historic route of the M-M Trail. While a portion of the historic route is not feasible for a National Scenic Trail, the AMC Berkshire Chapter M-M Trail Committee will continue to coordinate maintainers for the route as well as the maintainers for the New Hampshire section of the M-M Trail, which was not included in the study.

Typographical Errors

There appears to be a typographical error in Table 3 on page 17. The text describes Table 3 as showing the uses that were preferred among landowners, but the Table title says that these are the observed recreational uses, which appear to be shown in Table 2.

In the Chapter on “Trail Use Issues and Opportunities,” under Section I, “Alternate National Scenic Trail Route in Massachusetts,” on page 52, the study states that Cows Lumber has “expressed repeated and consistent opposition to land protection.” Throughout the study meetings, AMC believes Cows expressed opposition to federal

involvement in the trail on Cowls land, not to land protection in general. AMC recommends that the final report refines this statement to reflect a more accurate characterization of Cowls Lumber's views.

AMC values the spirit of cooperation and willingness of private landowners as well as public land managers to accommodate the M-M Trail and remains committed to working with all stakeholders to ensure the trail continues to be both a welcomed feature of the landscape and an asset to its surrounding communities.

AMC applauds the National Park Service and the project leaders for the work that went into the study, for organizing opportunities for public comment, and for responding to the recommendations of landowners, trail maintainers, users, and other stakeholders throughout the study process.

Sincerely,

Heather Clish
Director of Trail Stewardship