Dear Secretary Beaton,

The Department of Conservation is responsible for the construction and maintenance of the beautiful parks along the Neponset River. We have worked with the DCR to get the Neponset Trail and the parks along it built and maintained.

This letter is in response to the recently announced granting of Commercial Dog Walking Permits by the DCR. We understand that the intent is to control the walking of dogs in DCR parks but believe that the granting of Commercial Dog Walker Permits will make a bad situation worse. Allowing commercial dog walkers to operate their business on public land will encourage and attract more dog owners to bring their dogs here, more biologically hazardous dog wastes being deposited, more destruction of public spaces, more negative encounters with wildlife and the compaction of soil. What is the proposed method of enforcement? The DCR does not have the staffing to enforce the current dog regulations. We do not see how they can enforce these new ones. As bicyclists and walkers in DCR parks, we would find it extremely stressful to encounter 8 dogs, on 10 foot leashes along a narrow pathway. Many dog owners are responsible about cleaning up after their dogs, many are not, especially those who walk multiple dogs at once. Dogs can be a menace to wildlife, both plant and animal, and humans, both walkers and bike riders.

We are especially concerned about dogs off leash along trails in DCR parks, such as the Neponset Trail. For this reason, we are asking you to seriously consider banning commercial dog walkers from trails throughout the DCR parks, especially those which are paved for bicycle use, such as the Neponset, Nashua River, Norwottuck, Ashuwillticook, and Cape Cod Rail Trails and Breakheart, Stony Brook, and Wampatuck Reservations. This is a safety issue, as dogs on hard-to-see leashes which stretch across trails can cause bicycle crashes and dogs illegally off-leash have bitten people in local parks. Having to control multiple animals, commercial dog walkers have appeared in our experience to be less likely to control dogs on leashes and more likely to let them run free. Along the Neponset Trail, Victory Road Park is already frequently used by commercial dog walkers who let their dogs run off-leash and fail to pick up their waste. The whole park smells of dog wastes and clearly vegetation has been destroyed by the numerous dogs. It is likely that the dog wastes are contributing to the high bacteria level at nearby Tenean Beach, along which the Neponset Trail runs. Dogs are allowed to swim in the water, but children cannot due to contamination. This is a multi-million dollar park, along the waterfront, with beautiful views across the Neponset River and an ever increasing marsh around its boundary. Victory Road Park is a gateway to the Neponset River Reservation and the Neponset Trail. It should be a highly protected area, but instead it has become a wasteland due to insufficient enforcement of dog regulations. The DCR does notseem to have the ability to protect this area from negligent dog owners. If it can not be policed, the DCR should ban all dogs from Victory Road Park. That is the only way it can be protected and returned to the beautiful park it once was. It should be a park for humans and the natural wildlife.

Any permit charge should be high enough to fund the staff time needed to enforce the new permits. If the specific dollar amount cannot be raised, each permit should apply for one business at one location. If a business wants to walk dogs in multiple locations, they should get multiple permits. Location-specific permitting will also make it easier to enforce permit use.

In summary, we ask for

1. The exemption of all trails in the DCR from use by commercial dog walkers.

2. The exemption of all playgrounds and playing fields in the DCR from use by commercial dog walkers.

2. The total banning of all dogs from Victory Road Park.

Thank you for your time and considerations,

Jessica Mink, President for the Neponset River Greenway Council