



**WATER SUPPLY CITIZENS
ADVISORY COMMITTEE**
to the Mass. Water Resources Authority

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April 9, 2021

MWRA Board of Directors
100 First Ave.
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Subject: Recertification of DCR Watersheds

Dear Chair Theoharides and Board Members,

After reviewing the March MWRA Staff Summary on Green Forestry Certification, WSCAC has concerns about statements that appear incomplete or misleading. Our response:

1. DCR has incorporated only a portion of the recommendations in the STAC report. The five recommendations in the conclusion of the STAC Report are clear regarding how DCR watersheds should be managed. There is no external oversight to determine if these recommendations have been implemented.
2. Under green certification, the landowner is not responsible for the ultimate disposition of wood products. Management of the DCR watersheds focuses on water quality, not on documentation of wood products from the forest to the factory, or revenue-generating goals. Green certification programs promote water quality, biodiversity, and ecosystem health. Ensuring sustainable forest management is a goal DCR and a green certification program share. Certification strengthens the capability to realize that goal through collaboration with forest professionals, accountability to standards, and program transparency.
3. Quabbin's green certification provided positive publicity benefits. In a 2008 letter to DCR Commissioner Sullivan, Mass Audubon, the Sierra Club, the Environmental League of MA, the Appalachian Mountain Club, and The Nature Conservancy supported adherence to the green certification principles.
4. The recertification process occurs every 10 years. DCR updates their Land Management Plan every 10 years. There is no evidence that these plans would have to be rewritten to meet certification requirements. DCR's Plan recommendations are currently the *only* criteria being used to validate current forest management.
5. It is noted in the MWRA Staff Summary that DCR's Land Management Plan satisfies MWRA's interest in assuring that current forest management is meeting the goals of water quality and resilience in the short and long term. With forest health throughout the state and beyond increasingly affected by drought, disease, insect damage, and species decline, the ability of current management to meet long term goals is far from certain. Management will require responsive planning with attention to science-

based prescriptions to address changing climate conditions affecting forest health. If DWSP staff have not yet investigated both SFI and FSC, a study of SFI indicates this program as the best choice to meet watershed management goals.

6. Is an external body necessary or valuable to provide validation of DCR's forestry program? MA Representative Sabadosa has filed HD.3685, an "Act to Ensure Accountability and Public Rights Regarding Commercial Tree Harvesting on Commonwealth-Owned Lands." If signed into law, the bill would reinforce the state requirements of MEPA and the Global Warming Solutions Act. The public would have the right to participate in the planning of all tree harvesting on state-owned land.
7. If other major northeast water supply forest owners do not incorporate certification programs, is that a worthy justification for not supporting a program that promotes accountability and sustainability? The MWRA is known for leadership in the use of both water and wastewater infrastructure and treatment. The green certification of Quabbin watershed lands in 1997 was viewed as a positive and important environmental step in forest management. Continued support of certification could place the MWRA at the forefront of water supply forest management.

We appreciate the opportunity to review the Staff Summary and request that the Board of Directors discuss the prospect of supporting a more transparent, accountable, and collaborative DCR forest management program at their meeting in May. The Water Supply Protection Trust will meet in early June. Support from the Board would greatly improve the possibility of moving forward with certification.

On behalf of the WSCAC members, thank you for your consideration of this request.

Gerald Eves, Chair

Whitney Beals, Executive Committee

Lexi Dewey, Executive Director

Cc: Fred Laskey, Executive Director, MWRA

Joe Favaloro, Executive Director, MWRA Advisory Board