



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

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Department of Conservation and Recreation  
Division of Water Supply Protection  
Office of Watershed Management  
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RE: Public comment on the Division of Water Supply Protection: 2017 Draft Land Management Plan

On behalf of the Water Supply Citizens Advisory Committee (WSCAC), thank you for the opportunity to review the Division of Water Supply Protections' 2017 Land Management Plan. WSCAC commends Division of Water Supply Protection (DWSP) staff on the scope of information provided within the Plan and its overall organizational structure. Writing a management plan for four watersheds, all with unique characteristics, is a complex and evolving enterprise. WSCAC appreciates the expertise and accessibility of DWSP staff who continue to provide committee members with tours and presentations on DWSP programs including forestry, wildlife management, land acquisition, and protection. WSCAC member's level of understanding is directly proportionate to the information provided by DWSP staff.

**Scope & Format**

While WSCAC understands DWSP's motivation behind combining all four watersheds into one document, we believe that this comprehensive format further necessitates the creation of a separate, executive summary—as requested in 2012 by the Science and Technical Advisory Committee (STAC) in 2012. The issuance of an executive summary, written with the public in mind, is critical in terms of accessibility because the Plan is dense and may not be easily understood by the general public. The Department of Conservation and Recreation (DCR) watershed communities should have a clear understanding of the programs and policies provided in this plan. We recommend that the DWSP provide copies of the Plan to the watershed communities and offer to provide a presentation, if requested. The importance of transparency cannot be overemphasized. Comprehension of the Plan by the public will further contribute support for DWSP.

To further improve public understanding, WSCAC suggests that the report, which discusses several categories of watershed lands, clarify the standards that are used for managing each category. The standards are scattered throughout the report. We suggest that the report include a matrix that lists the specific categories of watershed lands and the relevant standards for their management. This would enable the readers of the report to have a quick overview of the complete watershed management picture. Such a matrix of categories and their management standards could be presented in the following incomplete example:

**Category**

- (1) DCR-owned non-sub watershed property
- (2) DCR-owned and managed non-sub-watershed property
- (3) DCR-owned and managed sub-watershed property
- (4) Non-DCR-owned properties subject to Watershed Protection Restrictions negotiated by DCR
- (5) Non-DCR-owned properties in the watershed not subject to WPR's

**Standards**

- Not managed, no removals, etc.
- 2 acre openings & 1% regeneration, etc.
- 2 acre openings, 1% regeneration, & removals of up to 25% per ten years, etc.

We offer the following comments on sections of the Plan that we believe require further clarification:

## **Maintenance of DWSP Roads**

### **Section 4.1.10**

- More specific information is needed on how DWSP will address the need for maintaining roads used for logging and the landing sites for temporary storage of logs. These roads and sites require surfaces that can safely meet the needs of heavier and longer logging trucks, trailers and machinery. Logging is frequently done in areas that can include steep slopes, stream crossings and shoreline proximity. The option to allow logging companies to decide on bringing in gravel and other aspects of preparing a logging site is not in DWSP's best interest. Roads and landings used for logging deserve the level of attention and maintenance that is provided to DWSP fishing areas. It is advisable to develop a consistent gravel source and provide a maintenance program that is aligned with the timing of logging jobs if DWSP is to successfully continue its logging program. We look forward to reviewing the plan DWSP is developing for Quabbin and Ware River that will identify sections of roads needing grading and other improvements.

## **DWSP Watershed Forest Management Objectives**

- DWSP's forest management objectives focus on maintaining a healthy forest that supports the protection of a high-quality drinking water source. Disease, insects, invasive plants, browsing wildlife and a changing climate make this goal a moving target. Maintaining species diversity and promoting regeneration are necessary goals, and we encourage DWSP to further clarify the methods on how this will be achieved. Due to the factors noted above, we recommend more selective thinning and additional green retention in proposed lots to address the effects of browsing and invasive plants on regeneration.

The annual deer hunt has decreased the deer population but it is well known that moose are already impacting the forest. As noted in our 2007 comments on the previous Land Management Plan, a definitive plan is needed to assess current impacts and the effects as the population continues to grow. If a moose policy is not forthcoming, releasing regeneration from logging is unlikely to meet the goal of species age or diversity.

Moving into the future, a detailed description of the tools DWSP will use to stay informed on the evolving environmental conditions affecting the forest would be helpful. We encourage DWSP to use the research offered by the STAC, Harvard Forest, UMass and other sources of expertise to help guide and respond to potential changes in the management of DWSP's forestry program. Third party oversight which WSCAC continues to support is another opportunity to share information with a broad range of forestry professionals.

## **Early Successional Habitat Management for Landscape Diversity**

### **Section 4.2.5**

- This new section of the Plan describes the importance of early successional habitat for a variety of wildlife species of concern in Massachusetts. Further clarification is needed on the following:
  - It is not clear from the maps in the Plan where the focus areas are in each watershed.
  - Why is this type of secondary management, which requires additional specialized maintenance, suitable for a water supply protection forest?
  - What is the cost-benefit of introducing and maintaining early successional habitat management?

- While we understand the significance of this type of habitat in Massachusetts, we question whether DWSP is the appropriate vehicle to promote it because Fisheries & Wildlife is tasked with habitat establishment and protection.

## **Climate Change: Adaptation Strategies**

### **Section 4.2.7**

- As noted in this section, the climate change projections for Massachusetts will challenge forest managers to make decisions with added levels of uncertainty. Table 4-13 identifies strategies, some of which are applicable to water supply such as structural diversity and others for wildlife habitat such as ecosystem redundancy and connectivity. A detailed description of specific activities that are currently being implemented in the watersheds to prevent and control invasive plants would be helpful. A description of the strategies in place that document how forests are more resistant to pests would be helpful. The establishment of additional areas of reserves to preserve established older groups of trees to monitor the effects of a warming climate would be helpful.

### **Section 4.2.5**

- This section discusses DWSP's efforts to promote late seral forest conditions. Table 4.9 shows the acreage of "limited management of forested areas" by watershed. The majority of these areas are wet, steep or otherwise inaccessible (10,735 acres out of 17,056). Islands make up another 3,848 acres. Total watershed land area is 227,881 acres, so the limited management areas are currently 7.5% of total watershed lands. It is unclear from the report how the "limited management" areas are to remain as such by DCR staff and loggers overtime. For example, in the 2013 DWSP Response to the STAC has almost the exact same text as this section of the Plan, but the summary table indentified 22,831 acres of "limited management" areas. **WSCAC is concerned that in only 4 years, DWSP has already diminished the acreage of limited management areas by 25%.**

In summary, WSCAC recommends providing the following in the Final Plan:

- Inclusion of a matrix that lists the specific categories of watershed lands and management standards.
- Specific information on the development and maintenance of roads used for logging and landings.
- The implementation schedule of strategies noted for controlling invasive plants.
- Strategies for moose management.
- The value of early successional habitat implementation as secondary management on DWSP watersheds.
- Additional information on how current forest management strategies will address the projected effects of climate change noted in the Plan.

Thank you for the opportunity to comment.

Sincerely,



Executive Director, WSCAC