



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

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February 15, 2021

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

Dear Chair Theoharides and Board Members,

The members of Water Supply Citizens Advisory Committee (WSCAC) would like to introduce the case for recertifying, through green certification, the DCR-Division of Water Supply Protection's Quabbin, Ware River and Wachusett watersheds. Forestry practices in the watersheds are not well supported by the public. There are reasons to question whether they closely follow DCR's Land Management Plan, and portions of the December 2012 forest management report of recommendations by the Science and Technical Advisory Committee (STAC) have yet to be done.

WSCAC recommends recertification as the most direct, cost-effective way to rebuild public trust, address reputational risk, and acknowledge the need for a broader technical perspective on forest management in the DCR watersheds.

At the December 2020 Water Supply Protection Trust meeting, WSCAC presented the benefits of green certification:

- Recertification of DCR's watershed lands adds credibility and accountability to the requirement to conduct forest management and avoid costly filtration.
- Recertification can revitalize the knowledge base of watershed forest management by providing direct access to research and technical support from a wide range of forestry professionals.
- Recertification strengthens public support, knowledge and understanding of DCR's forest management.

DCR's Division of Water Supply Protection is against recertification for the following reasons stated at the December Trust meeting:

- There is not any financial gain to green certification.
- The process is not a constructive use of staff time.
- The cost of recertifying is not worth the effort.
- Recertifying will not encourage public support.

DCR's management of the watershed forests is not a revenue generating program. The goal of the program is to manage for water quality by maintaining a diverse and resilient forest buffer to avoid filtration.

Current and retired DCR foresters have supported the previous green certification process because of the ability to collaborate with other forestry professionals. DCR's current reliance on historical practices and management plans may not address the conditions occurring in forests today as the climate warms.

The cost of recertification is well within DCR's current budget as paid for by the MWRA ratepayers via the Trust, and support has been voiced by the MWRA Advisory Board through its participation on the Water Supply Protection Trust. The Trust has discussed recertification at recent meetings but has not yet voted on whether to support the process of recertifying.

DCR has stated that green certification will not generate any public support of its forestry management practices. The question is, given that DCR initiates very little public dialogue, and has not followed the recommendations of the STAC report which strongly request public engagement, how does DCR know what the public will support? It is clear that there are public groups opposed to state forestry practices and have voiced support for more oversight in how public lands are managed. H. 4415-An Act to Study Forest Management Practices is proposed legislation by Rep. Whipps which calls for a new commission to study forest practices on all state lands. The Attorney General's office is also interested in forestry practices as noted in the September 2020 webinar, The Critical Role of Forests in Protecting Climate and Public Health.

The best forestry management practices are based on professional standards and scientific data. The inclusion of transparency and accountability through certification can generate public support for these practices. WSCAC has supported the forestry program but on the condition that moving forward, watershed lands will be recertified.

In summary, WSCAC requests the following:

- A vote of support by the MWRA Board of Directors to recertify DCR-DWSP watershed lands to promote transparency and accountability in forestry management, and to be funded within the DCR Watershed Division budget.

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

Joseph Favaloro, Executive Director, MWRA Advisory Board