



STAFF SUMMARY

TO: Board of Directors
FROM: Frederick A. Laskey, Executive Director 
DATE: March 17, 2021
SUBJECT: Response to WSCAC Correspondence on Green Forestry Certification

COMMITTEE: Water Policy & Oversight

 X INFORMATION
 VOTE

Hillary Monahan, Environmental Planner
Stephen Estes-Smargiassi, Dir, Planning and Sustainability
Preparer/Title


David W. Coppes, P.E.
Chief Operating Officer

RECOMMENDATION:

For information only.

DISCUSSION:

In its letter to the Board of Directors dated February 15, 2021, the Water Supply Citizens Advisory Committee (WSCAC) raised the question of whether the watershed forestry program should pursue certification under one of the “green forestry” programs. A copy of that letter is attached.

This question had been raised and discussed recently at the Water Supply Protection Trust meeting in December 2020, as well as several times in 2015 and 2016.

The watershed forestry program is designed to promote long-term protection of water quality and forest resilience to disease or natural disaster. When the Quabbin Reservoir was constructed in the 1930s, the vast majority of the watershed was in open fields, with the preexisting forest having been cleared for farm use or damaged in the 1938 hurricane. Thus, almost all of the current forested lands are of a relatively uniform age, with large stands of single species. The goal of the program is to slowly, over decades, move the forest toward a multi-species, uneven aged forest that is less likely to be damaged by invasive species or a natural disaster such as a hurricane, reducing the risk to water quality. All other objectives are treated as secondary to water quality protection.

The green forestry certification processes started in the 1990s and were intended to promote good forestry practices by certifying to consumers that their wood-based products, such as lumber, paper or furniture, came from a well-managed forest. The programs are focused on promoting biodiversity, well-functioning ecosystems and water quality, while protecting the interests of local and regional stakeholders such as indigenous peoples. Certification of a product requires documentation of all of the steps from the forest to the factory. The two primary voluntary certification programs are the Forest Stewardship Council (FSC) and the Sustainable Forestry Initiative (SFI).

The watershed forestry programs had been certified under the Forest Stewardship Council process from 1997 to 2004. The Commonwealth subsequently choose to pursue certification of all state forestry lands and was certified in 2004. Due to the number of issues raised during the recertification process in 2009, which would have required substantial changes to practices in other agencies programs, the Commonwealth choose not to complete the process. MWRA and DCR staff are not aware of any current plans by other Commonwealth agencies to move toward certification. DCR could again separately pursue certification of the watershed forestry program.

At the heart of the issue is the question of whether having an external body provide any sort of validation of the forestry program is necessary or valuable. None of the other major northeast water supply forest owners such as NYC, Portland Maine, nor Providence RI have chosen to have their watershed forestry programs certified by SFI or FSC; although Portland had been certified under the another program, the American Tree Farm System but has let it lapse.

One goal of the voluntary forestry certification programs is to create markets for sustainably produced forest products. For example, MWRA specifies FSC certified paper for the annual water quality report. The watershed forestry program is not a major producer of forest products; individual lots are small. Furthermore, DCR has not found that the certification offers a cost advantage to those bidding on parcels, although there may be a slight improvement in the ability to sell pulp wood for paper production.

Being green certified would potentially provide positive publicity benefits. When the watershed forestry was first certified in 1997, it did receive positive coverage. The certification process requires an extensive stakeholder consultation process; this could result in both positive and potentially negative publicity. DCR staff have expressed concern that the public process would be relatively one-sided, and that established environmental groups may not publicly offer their support for even well-conducted forestry operations. There are individuals and organizations whose objective is to seek to prevent or severely restrict all forestry activities, with a preference for establishing “forever wild” forest preserves. While some of the interest is based on philosophical or aesthetic concerns, there are some groups whose interest arises from concerns that while the use of forest products for energy *may* be greenhouse gas neutral over the long term, in the short to medium term, (perhaps several decades) more greenhouse gases are released than the regenerating forest will be able to recapture. None of the green certification processes deal directly with this concern in their certification process, as they are all designed to allow and promote forestry. In any case, the DCR watershed forestry program is relatively small in proportion to their holdings.

The certification processes require substantial documentation from planning, through implementation to tracking and review, with public stakeholder engagement at multiple points.

DCR’s forestry program is well documented in its Land Management Plan (2017), which is updated periodically with an opportunity during that process for public input. The entire watershed forestry program was the subject of an intensive independent scientific review in 2012 by the Science and Technical Advisory Council (STAC¹) with extensive public comment opportunities.

¹ The STAC was originally chartered in the 1990ss by DCR as the Quabbin Science and Technical Advisory Committee, and was later tasked in 2010 to assist in overseeing forestry programs by the Secretary of EEA. It includes forest, wildlife, and natural resource researchers and managers from several University of Massachusetts Amherst departments, Harvard Forest, the USDA Forest Service, Mount Holyoke College, Amherst College, the Institute of Ecosystem Studies, US Geological Survey, Massachusetts Audubon Society, the New England Small Farms Institute, the MA Natural Heritage and Endangered Species Program, Hampshire College, and several state agencies.

DCR used the recommendations of the STAC report in the development of the current Land Management Plan.

The FSC and SFI both have detailed certification standards and documentation requirements. SFI has 101 separate specific criteria for which organizations must document compliance; FSC has 57 slightly broader ones. These criteria are summarized in the attachment. The DCR watershed forestry program likely meets many of the substantive requirements. However, DCR's 2017 Land Management Plan was written to be responsive to the STAC report recommendations and to address water quality concerns. To meet certification requirements, it would need to be re-written or additional documentation developed. Responses for the issues identified in the 2009 FSC renewal review (issues that related to the watershed program rather than other state agencies) would also need to be developed. DCR has indicated that this may require a significant level of effort.

A review of SFI and FSC criteria indicate that the many items are only indirectly related to physical forestry management practices or water quality. Many SFI indicators relate to other societal goods, such as natural heritage data, forest tree biotechnology research, and wood producer training courses. The *SFI 2015-2019 Forest Management Standards and Rules*² promote sustainable forestry practices through a set of 13 Principles, 15 Objectives, and 37 Performance Measures. Of the total 101 criteria, around 30 items relate to *physical* forestry management practices. Similarly, the *FSC Principles and Criteria for Forest Stewardship*³ is comprised of 10 Principles and 57 Criteria that focus heavily on socially beneficial management practices. About half relate to actual physical forestry practices. FSC is in the process of revising its criteria and standards again with the next release expected in 2022. Should green certification be pursued, the forestry program would need to be regularly updated to continue to meet the certification requirements.

DCR's 2017 Land Management Plan satisfies MWRA's interest in assuring that DCR's forest management programs are building a resilient forest and protecting reservoir water quality in both the short term and the longer term. Green forestry certification while not necessary, could provide additional public evidence of the quality of the DCR program.

At MWRA's request, DCR is in the process of producing a comparison of current practices with the criteria of the two green forestry certification programs, including review of issues raised during the 2009 certification. MWRA staff anticipate that DCR will complete this review by June 2021. Once that review is complete, MWRA staff will evaluate it and return to the Board with any appropriate recommendations regarding green certification.

ATTACHMENTS:

Attachment A - Summary of SFI and FSC Certification Criteria
Attachment B – WSCAC Letter of February 15, 2021

² https://forests.org/wp-content/uploads/2015_2019StandardsandRules_web_Feb_2017.pdf

³ <https://fsc.org/en/document-centre/documents/retrieve/16c5cce0-ccccf-434d-953e-a27c6750fbad?mode=view#viewer.action=download>

Attachment A - Summary of FSC and SFI Certification Criteria

Forest Stewardship Council (FSC) Criteria

- ❖ Workers' Rights and Employment Conditions
 - Six of the 57 criteria relate to promoting gender equality in employment practices, training opportunities, awarding of contracts, processes of engagement, and management activities.
- ❖ Indigenous Peoples' Rights
 - Six of the 57 criteria relate to identifying and upholding Indigenous Peoples' legal and customary rights of ownership, use and management of land, territories and resources affected by management activities.
- ❖ Community Relations
 - Eight criteria relate specifically to enhancing the social and economic wellbeing of local communities, including identifying sites which are of special cultural, ecological, economic, religious, or spiritual significance, and for which these local communities hold legal or customary rights.
- ❖ Environmental Values and Impacts
 - Ten of the 57 criteria relate to protecting or restoring natural water courses, water bodies, riparian zones, and their connectivity, avoiding negative impacts on water quality and quantity, and mitigating and remedying those that occur.
- ❖ Management Planning
 - Six criteria relate to proactively and transparently engaging affected stakeholders in management planning and monitoring processes, and engage interested stakeholders on request.
- ❖ Monitoring and Assessment
 - Five criteria relate to implementation of a tracking and tracing system proportionate to scale, intensity and risk of its management activities, for demonstrating the source and volume in proportion to projected output for each year, of all products that are marketed as FSC certified.
- ❖ High Conservation Values
 - Four criteria require engagement with affected stakeholders to assess and record the presence and status of species diversity, landscape-level ecosystems and mosaics, ecosystems and habitats, critical ecosystem services, community needs, and cultural values.
- ❖ Implementation of Management Activities
 - Twelve criteria require that the organization manage infrastructural development, transport activities and silviculture so that water resources and soils are protected, and disturbance of and damage to rare and threatened species, habitats, ecosystems, and landscape values are prevented, mitigated and/or repaired.

Source: <https://fsc.org/en/document-centre/documents/retrieve/16c5cce0-ccc4-434d-953e-a27c6750fbad?mode=view#viewer.action=download>

Sustainable Forestry Initiative (SFI) Criteria

- ❖ Sustainable Forestry
 - Thirty of the 101 criteria relate to promptly reforesting after final harvest as per documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration, and prompt reforestation.
- ❖ Protection of Water Resources
 - Eight of the 101 criteria relate to implementation of water, wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices, and provincial guidelines..
- ❖ Protection of Biological Diversity
 - Fifteen of the criteria, require that Program Participants document diversity of forest cover types and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the landscape scale.
- ❖ Aesthetics and Recreation
 - Eight of the 101 criteria relate to the impact of harvesting on visual quality; average size of clearcut harvest areas does not exceed 120 acres.
- ❖ Protection of Special Sites
 - Two criteria require that program participants use information from existing natural heritage data, expert advice, or stakeholder consultation in identifying or selecting special sites for protection.
- ❖ Responsible *Fiber Sourcing* Practices
 - One criterion requires exploration of markets for underutilized species and low-grade wood and alternative markets (e.g. bioenergy markets).
- ❖ Recognize and Respect Indigenous Peoples' Rights
 - Four criteria require communication with and response to local Indigenous Peoples with respect to sustainable forest management practices on their private lands.
- ❖ Community Involvement and Social Responsibility
 - Six criteria require participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive programs.
- ❖ Communications and Public Reporting
 - Four criteria require increased transparency through annual reporting on performance by way of the *SFI Forest Management Standard*. The summary audit report must be posted on the *SFI Inc.* website for public review.

Source: https://forests.org/wp-content/uploads/2015_2019StandardsandRules_web_Feb_2017.pdf



**WATER SUPPLY CITIZENS
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February 15, 2021

MWRA Board of Directors
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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



Green Forestry Certification

March 17, 2021



Forestry Certification Criteria

FOREST STEWARDSHIP COUNCIL		SUSTAINABLE FORESTRY INITIATIVE
Workers Rights/Conditions		Sustainable Forestry
Indigenous Peoples' Rights		Protection of Water Resources
Community Relations		Protection Of Biological Diversity
Environmental Values & Impacts		Aesthetics and Recreation
Management Planning		Protection of Special Sites
Monitoring & Assessment		Responsible <i>Fiber Sourcing</i> Practices
High Conservation Values		Indigenous Peoples' Rights
Implementation of Mgt Activities		Community Involvement
		Communications & Public Reporting