



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

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April 7, 2023

MWRA Board of Directors  
100 First Ave.  
Charlestown Navy Yard  
Boston, MA 02129

Subject: DCR-DWSP Forest Management Review

Dear Secretary Tepper and Board of Directors,

After reviewing the March 15, 2023 MWRA Staff Summary on DCR Watershed Forestry Review, WSCAC has the following comments:

1. The Staff Summary provides inaccurate historical information that understates the complexity of the watershed forest. It failed to mention that DWSP lands were the first public watershed lands to receive national Green Certification, a process that provided valuable oversight. Also not mentioned is how the STAC report was challenged by DWSP's response, a report titled, *From Here Forward* submitted in August 2013. DCR's report has continued forest practices that fail to regenerate diverse long lived species, and ignores the impact on watershed soils from heavy logging machines. There is a lack of information on the present challenges affecting forest management in the watersheds which include:
  - Increased species mortality from climate change, diseases and insects.
  - Standard silvicultural practices for regenerating mixed species stands requires advance regeneration be in place prior to removing overstory.
  - Control of invasive species that inhibit native species.
  - The challenge of extractive forestry practices while maintaining productive watershed soils without snow and frozen ground. Lighter and smaller logging equipment should be used to minimize soil compaction and other impacts.

Recently viewed sites in New Salem that were harvested several years ago all failed to meet diversity requirements despite 1-3 acre openings. Advanced regeneration of long lived species was absent. Deep logging ruts were easily found on all lots.

2. The five recommendations in the conclusion of the STAC report are clear regarding how DCR watersheds should be managed. However, DCR has incorporated only a portion of these. For harvesting, the emphasis is on adopting shelterwood type cutting to encourage regeneration of long lived species. Tellingly, there is no external oversight to determine if these recommendations are being implemented.
3. 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. Though MWRA staff may be familiar with DCR's Land Management Plan, they rely exclusively upon DCR's Watershed Division staff to manage and oversee the proposed for harvesting operations. There is no independent verification that such operations conform to the Land Management Plan.

Forest health throughout the state and beyond is increasingly affected by drought, disease, insect damage and species decline. Science-based management practices should be adapted to meet the goals of a diverse, resilient and multiage watershed forest and to address changing climate conditions affecting forest health.

4. WSCAC considers third-party oversight to be necessary and valuable. Without it, we cannot endorse DCR's forestry program. The committee has previously outlined the benefits of transparency, accountability and oversight to DCR and the public as well as to the MWRA Board of Directors and the Water Supply Protection Trust.

Recertifying watershed lands with the Sustainable Forest Initiative (SFI) or Forest Stewardship Council (FSC) would be a step in the right direction to ensure that DCR's forest management practices are meeting the forestry objectives written in the STAC report and in the Land Management Plan. Certification provides transparency and accountability to the public.

All MWRA programs and projects are subject to oversight and fiscal accountability, WSCAC recommends that this oversight be extended to DCR programs paid for by MWRA ratepayers.

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 its next meeting.

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



**New Salem logging sites – impact of heavy equipment, lack of advanced regeneration before logging, lack of species diversity in regeneration.**

