July 20, 2015

Department of Conservation and Recreation
Office of Public Outreach
251 Causeway Street, Suite 600
Boston, MA 02114

Subject: DCR Division of Water Supply Protection’s FY16 watershed forestry lots

To Whom It May Concern,

WSCAC is the Water Supply Citizens Advisory Committee. As a formally contracted advisory committee to the MWRA Board of Directors and staff, WSCAC appreciates this opportunity to comment on the DCR Division of Water Supply Protection’s proposed FY 16 watershed forestry lots in the Quabbin, Ware River and Wachusett watersheds.

Our ongoing attention to DCR’s forestry program is based on the belief that MWRA’s unfiltered public water supply system requires the highest standards of forest management. The primary purpose of the watershed forestry program, therefore, is to create a sustainable and resilient watershed forest through a diversity of age classes and tree species.

WSCAC supports the recent restart of the forestry program, as long as the program positively contributes to forest complexity and diversity, which thereby enables the watershed forests to withstand natural stresses. WSCAC appreciates DCR’s commitment- as stated in the report titled, From Here Forward: Proposed Changes to the Department of Conservation & Recreation – Division of Water Supply Protection’s Watershed Forest Management Program, dated February 5, 2013 - to increased transparency, accountability, and additional improvements to public information through scheduled forestry tours and posting of proposed forestry lots with maps and lot descriptions on the DCR website.

To continue the process of improving public understanding of the forestry program and maintaining public trust, we recommend the following:

- After forestry lots have been marked, schedule and announce public tours to improve public understanding of the process and invite public feedback on actual cutting plans. Simply reading plans for proposed lots does not provide the public with the scope of information necessary for informed comments. Accurate, informed, and thoughtful feedback is best cultivated when harvesting plans include details such as which trees will be cut, which trees will be saved as legacy and wildlife habitat trees, the identification of existing regeneration, where the landings and roads will be located, and where vernal pools and historic sites exist. Consideration should be given to posting a relatively short online video that describes the aforementioned watershed “best practices.”

- Begin the process of recertifying the watershed forests. WSCAC strongly favors green recertification because it can provide additional review, oversight, and the opportunity for improving practices through interaction with outside experts. Recertification can also serve to increase public trust and provide strong assurance that forestry done in the watersheds is held to the highest standards.
• Adopt and post the following Executive Summary as recommended on page 3 of the STAC report:

“Develop a 20 to 30 page illustrated plain-language summary of the DWSP system and management plans for a “Scientific American” audience in collaboration with the DCR, EEOEA, and MWRA Public Affairs offices. Develop a 4-page system and plan overview document for the same audience; it also should serve as a briefing document for visitors. Both documents should be readily accessible on the DCR website. The 4-page overview should be small enough to disseminate as an email attachment.”

WSCAC looks forward to providing detailed comments after the proposed lots have been marked.

Thank you for the opportunity to comment.

Sincerely,

Lexi Dewey
Executive Director