



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

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The **Water Supply Citizens Advisory Committee** (WSCAC) thanks the Climate Forestry Committee (CFC) members for their hard work and the elaboration of the Climate Forestry Report. WSCAC appreciates the opportunity to comment on the final report during the public input session.

Established in 1978, WSCAC advises the Massachusetts Water Resources Authority (MWRA) and state agencies on water resource policy and watershed protection. WSCAC provides comments, information, advice, recommendations, and guidance as to the direction, intent, and execution of water planning and policy development. After reviewing the report, WSCAC would like to provide the following comments:

1. The assumption that the forest of the 21st Century, especially forest with passive management, will have the same or similar ability to sequester and store carbon as the Forest of the 20th century is not supported by the Continuous Forest Inventory Data (CFI) of DCR's Forestry (William VanDoren) and DCR/DWSP forests that include Woodlands, Reserves, and Park Lands that indicate that the forest is dying. Forest dying can also be illustrated by the recent die-off of 50,000 acres of oaks between Quabbin and Southeast Massachusetts, with 2,000 just on Quabbin Reservoir and 43.9% of natural deaths of gross growth in Quabbin and Ware watersheds between 2001 and 2020, as indicated in the report (Page 20).
2. Expanding on the Executive Summary, WSCAC understands the importance and necessity of debate in decision-making, but for the sake of precision and minimizing confusion, WSCAC suggests that it would be helpful if the committee spared the legislators and the public the display of some of the disagreements that occur among committee members in the report executive summary (see "Resilience" on page 6 and "Public Water Supply Management" and "Wood Production" on page 7). The experts should have come to a common ground after the contradictory debate incorporated in the body of the report (see pages 34 & 35 for "Resilience" and pages 41 to 44 for "Public Water Supply Management" and "Wood Production"). The Executive Summary should focus on providing recommendations and supporting elements to these recommendations deduced from the debate. With no specific recommendations, forest management will not change and will remain in the same position as when EEA Secretary Tepper introduced the "pause" in management.
3. WSCAC supports the continuous data collection and suggests that future forest carbon sequestration should be evaluated by agency staff and reviewed by EEA climate staff, considering a site-by-site approach based on existing characteristics, including current and future carbon sequestration potential, before proceeding with any forest management project in water supply watershed lands. Continuous data collection would provide a proper dataset so that the value of forest management can be weighed against potential carbon storage loss caused by management activities to better understand the costs and benefits of the management efforts.
4. WSCAC suggests that active management is necessary where maladapted species are present (red pine is used as an example in the Guidelines) to increase heterogeneity and enhance forest resilience, to provide wildlife habitat, or reduce the effects of invasive pests or plants to the forest's health. Human intervention in the forest should consist of careful light thinning rather than clear-cutting, which stimulates invasive plants, diseases, and insects that weaken our forest. WSCAC suggests that the management should consist of tree

thinning using hand felling, removing unhealthy stands while leaving behind healthy saplings for advanced regeneration, and reducing the harvesting of old-growth forests.

5. WSCAC suggests promoting proven strategies to optimize forest growth and sustainability. CFC should elaborate on strategies proven to work elsewhere to enhance forest growth. Strategies may include but are not limited to tree planting and advance regeneration strategies and tactics. CFC can also suggest techniques to protect young sprouts from grazing, especially when herbivores are excluded from hunting and cannot be controlled (for example, the moose population in Quabbin). WSCAC believes that cost-effective techniques exist to ensure forest regrowth and the CFC should be more specific about what strategies to adopt. Agencies may act in good faith, but if clear guidelines are not provided (see “Resilience,” “Public Water Supply Management,” and “Wood Production” on pages 6 and 7), forestry management practices might not achieve much in using the forests to mitigate climate.

In conclusion, WSCAC is not opposed to forest harvesting; however, health or light cuts needed by forests to remain healthy should be emphasized, and some criteria should be taken into consideration to protect water resources and soil quality and to increase forest diversity of species and age classes to promote resilience, and carbon sequestration:

- Minimize the sizes of openings to avoid even-aged forests, preserve advanced regeneration and tree diversity for a more resilient forest, and reduce exposure of young sprouts to grazers,
- Restrict equipment size and weight of harvesting equipment to reduce or avoid soil compaction and damage to surrounding tree stands, and favor hand felling and small equipment usage suitable for small openings and soil health,
- Perform logging in a way that does not diminish the rate of carbon sequestration of the forest but increases forest resilience and preserves soil quality,
- Control wildlife populations to reduce herbivore grazing that causes serious damage to young tree sprouts. In addition to deer hunting, introduce moose hunting in watershed lands such as Quabbin and Ware watersheds or provide enclosures to keep large herbivores out of harvested areas until new growth is well-established.

WSCAC thanks you for this opportunity to comment on the Climate Forestry Report. The hope for WSCAC is to see the concerns presented above be reflected in the final report,

Sincerely

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