



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

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Thank you for the opportunity to comment on "Forests as Climate Solutions". Our comments focus on DCR-DWSP watershed forest management as it pertains to water quality by using the forest as a natural filter.

The Water Supply Citizens Advisory Committee (WSCAC) to the MWRA has been researching and touring watershed forest management sites of DCR's Division of Watershed Management for over ten years. We support the temporary moratorium on commercial harvesting for the following reasons:

- DCR-DWSP's current 2017 Quabbin Land Management Plan calls for diversifying forest age structure and species composition" primarily with varying opening sizes. DWSP employed openings of 1-5 acres that resulted in a moratorium of forestry operations for several years. During this time, the Scientific Technical Advisory Committee (STAC) devised a plan favoring irregular shelterwood (1/3 acre openings) combined with thinings. This recommendation was disregarded and DWSP continued with openings of 1-3 acres. This management has failed to meet the species diversity requirements of the Land Management Plan due to:
 1. Impacts of uncontrolled heavy logging equipment on both soils and regeneration
 2. Lack of advance regeneration of long lived species, especially oak species
 3. Deer and moose browsing
 4. Insects and disease (Beech leaf disease, Emerald Ash Borer, Gypsy Moth, Hemlock Woolly Adelgid, Red Pine Scale, White Pine Needle disease)
 5. Inadequate removal of dead and dying trees to promote growth of healthy trees
 6. Invasive plants
- DCR-DWSP's 2017 Land Management Plan is currently the only criteria being used to validate current watershed forestry practices. There is no external oversight to determine if recommendations are being followed and if goals are being met.

WSCAC recommends that DCR-DWSP return to green certification through FSC or SFI. Certification provides external oversight, strengthens the ability to realize watershed goals through collaboration with third-party foresters, and provides accountability to standards and program transparency.

WSCAC welcomes the plan to develop and implement a science-based state forest management plan that includes watershed land, and that accounts for the impacts we are already seeing from climate change on our forest resources.

We look forward to learning more from the Administration on the development and updated set of climate-orientated forest management guidelines.

Thank you for the opportunity to comment on this important process.

Sincerely,

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