

Charles River Conservancy

Arborway Coalition

Bike to the Sea

Blackstone River Watershed Association

Boston Cyclists Union

Boston Harbor Now

Cambridge Bicycle Safety

Charles River Watershed Association

Connecticut River Conservancy

Emerald Necklace Conservancy

Esplanade Association

Friends of Herter Park

Friends of Nantasket Beach

Friends of the Blue Hills

Friends of the Boston Harbor Islands

Friends of the Malden River

Friends of the Middlesex Fells Reservation

Friends of the Mount Holyoke Range

Friends of Walden Pond

Friends of Wollaston Beach

Green Cambridge

Green Streets Initiative

Lawrence & Lillian Solomon Foundation

LivableStreets Alliance

Magazine Beach Partners

Massachusetts Bicycle Coalition

Massachusetts Conservation Voters

Massachusetts Land Trust Coalition

Massachusetts Rivers Alliance

Memorial Drive Alliance

Muddy Water Initiative

Mystic River Watershed Association

Neponset River Greenway Council

Neponset River Watershed Association

New Brook Farm, Inc.

Newton Conservators

RESTORE: The North Woods

Southeastern Massachusetts Pine Barrens Alliance

Southwest Corridor Park Conservancy

Speak for the Trees, Boston

The Friends of Hemlock Gorge

Walden Pond State Reservation Advisory Board

WalkBoston

WalkMedford

Winchester Traffic and Transportation Advisory Committee

June 21, 2021

Secretary Kathleen Theoharides  
c/o Faye Boardman, Chief Operating Officer & Commission Chair  
Massachusetts Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900 Boston, MA 02144

SENT VIA EMAIL

Secretary Theoharides,

Thank you for your continued attention to improving the management, operations and asset condition of the natural, cultural and recreational resources held by the Department of Conservation and Recreation through the DCR Special Commission. The work of DCR and this Commission is increasingly urgent as we endeavor to mitigate the effects of climate change, reckon with inequity, invest in environmental justice communities, and recover from the COVID-19 pandemic.

We write once again as a coalition of DCR's partner organizations from across the Commonwealth representing dozens of communities, broad expertise in resource management and community engagement, thousands of volunteers, and millions of dollars leveraged annually to support our state parks. We are grateful for the attention you gave to the [April 26th letter](#), and the fulfillment of several requests to make the Commission process more robust and accessible for public input, including meeting the legislative mandate to fill the second Commission seat for a representative of friends groups, a modest timeline extension, and holding additional stakeholder engagement sessions. This letter aims to summarize constructively the common recommendations shared and reinforced throughout the stakeholder engagement process, so that we can continue to make real, measurable progress toward more equitable, effective, and efficient management of DCR and the Commonwealth's natural resources.

The Special Commission process has highlighted many of DCR's strengths, including how the agency rose to the challenge of the pandemic over the last fifteen months. In the face of a public health crisis, Massachusetts state parks saw increases in use of up to 300% and remained open while other parks in the region closed. Important safety and health information was shared over social media, allowing visitors to plan for their visits and take advantage of the outdoors to maintain health and wellbeing throughout a challenging time.

Praise for the DCR staff, particularly those in the field, has resounded widely among the agency's partners. Many cited examples of DCR employees going well beyond their job descriptions in service to the parks, people, and resources they steward. Our recommendations ultimately aim to build on these assets and empower all those we respect and appreciate within the agency. To capitalize fully on that dedication and expertise, however, DCR needs to undertake system-level change, beginning with long-overdue investment in the agency itself.

## RECOMMENDATIONS TO THE DCR SPECIAL COMMISSION

During the stakeholder listening sessions, participants answered “what does success look like for the DCR over the next five years?” To realize a DCR that can meet its mandate requires addressing several fundamental issues must be addressed and solutions for those issues adopted.

**Increase the DCR budget.** We cannot overstate that the most important issue to address is the grossly inadequate funding of DCR. Our state parks are key to our economy, health, and resilience, yet the DCR’s general revenue share of the FY21 budget was \$3 million less than it was in 2009—during a period when the overall state budget saw an increase of \$18 billion. Nearly all other recommendations for improving the agency hinge on addressing its lack of capacity, such as understaffing across departments and escalating deferred maintenance. Massachusetts prides itself on being a national leader in sustainability and the green economy, but we have allowed the management of our natural and cultural resources to deteriorate to dangerous levels. **As the leading action item from this Commission, we ask for leadership in setting the DCR capital and operating budgets based on a thorough, data-driven evaluation of the resources needed to amply maintain our state parks, forests, and water resources.**

**Define DCR’s mission and vision in a 21st-century context.** Development of an agency-wide strategic plan is essential for priority-setting and effective planning, without which the agency will continue to find itself stuck in models of the past. Since the merging of the Metropolitan District Commission and Department of Environmental Management, our state parks have experienced increased pressure from climate change, population growth and, most recently, a worldwide pandemic, all of which have disproportionately affected people of color. We seek the creation of an action plan centered on 1) **equity**, by directing resources to environmental justice communities to addressing longstanding inequities in access to open space, and 2) **resilience**, through statewide coordination of resource management as our front line of defense and best opportunity for climate adaptation.

**DCR should not transfer assets to other entities, but should increase collaboration among state and local authorities.** Stripping assets from a vastly underfunded agency sets a dangerous precedent. This determination cannot and should not be made based on DCR’s current capacity and without clarifying the agency’s mission, strategic priorities, and resource needs. We recognize that DCR has a diverse portfolio of properties and facilities—from roadways to reservoirs—but this diversity is precisely what makes our state parks special and positions DCR to address climate change threats holistically, in a way that almost no other agency can. From retrofitting dams and parkways to protecting communities against sea-level rise and storm surge to creating and stewarding open spaces that absorb stormwater, reduce heat islands, and provide space for recreation, unified DCR management would offer many co-benefits. Dividing these assets will impair the state’s climate-resilience efforts and increase inequity across our communities, enabling only the wealthiest cities and towns, with the capacity to take on the financial and managerial burden of these resources, to enjoy well-maintained public parks and natural resources. Rather than seeking to transfer its assets, DCR should take full advantage of the unprecedented increase in federal funding anticipated over the next several years to rebuild its crumbling infrastructure and develop frameworks for shared management across agencies and more efficient nonprofit partnerships.

This is especially true for **parkways**, which require immediate action to vastly improve safety, especially for people bicycling and walking. We are pleased that DCR has taken an important first step by releasing its long-overdue DCR Parkway Master Plan. However, this master plan offers no timeline or budget for implementing its recommendations. In order to prevent further fatalities and serious injuries on parkways, DCR must:

- Adopt MassDOT’s complete streets guidelines as the default design standard for all parkways.
- Use MassDOT crash portal data to implement quick-build improvements on the most dangerous parkway roads and intersections within the next 12 months.

- Align parkway speed limits with local speed limits, especially in municipalities that have reduced the default speed to 25 miles/hour or less.
- Provide a timeline and budget for completing the recommendations in the Parkway Master Plan and report publicly and annually on progress toward these goals.
- Set measurable goals to reduce the number of serious and fatal crashes on DCR roadways and report publicly and annually on progress toward these goals.
- Add analysis and recommendations for several key parkways currently missing from the plan.

Parkways are cultural and historic landmarks and should remain fully integrated components of parks and open spaces, used and enjoyed by people for walking, rolling, and riding—as originally intended. With a commitment to accelerated improvement in partnership with MassDOT, parkways should remain under DCR’s purview.

**Strengthen the culture of partnership within the agency to leverage external resources and maximize the Commonwealth’s return on its investment in DCR.** Regular disinvestment in DCR coupled with historic reluctance to engage with nonprofit partners has fostered a defensive culture within the agency and weakened trust among its closest partners, resulting in missed opportunities and forfeited contributions. Collaboration across public agencies, private friends groups, and stakeholders must be encouraged and modeled by DCR’s senior leadership, supported by training and management, and evaluated it with an equity lens. Additional recommendations to capitalize most effectively on external resources for our state parks include:

- **Use the MOU template to enable friends groups.** The draft shared in April 2021 greatly improved on the previous version by eliminating unattainable insurance requirements for friends groups. However, the blanket agreement still failed to recognize some of the essential functions of nonprofit partners, including resource management and capital improvements. Further, it failed to mitigate the significant permitting burden for each event held by a friends group, effectively excluding nonprofit partners without paid staff from using the agreement and programming their state parks. The DCR should adapt the MOU to further reduce red tape for nonprofit partners and reasonably increase their ability to operate within a defined geographic boundary.
- **Complete and maintain Resource Management Plans to keep partners better informed of agency priorities.** The RMP program is an essential process for evaluating property needs, documenting deferred maintenance, and ensuring a balance between developing recreational assets and ensuring natural resource protection and climate resilience. Used in tandem with an MOU and with the purpose of empowering partner organizations, these site-specific documents can enable deeper collaboration, advocacy and fundraising. With more than 200 properties in need of an RMP, DCR needs to expand the planning team well beyond one full-time employee and two seasonal hires to meet the appropriate timeline.
- **Actively include partners in planning processes.** Friends groups should have a seat at the table during master, capital, and resource-management planning for the sites they help maintain and activate. Further, to help implement RMPs and other initiatives, DCR needs a mechanism to permit qualified organizations to fund and manage design, operations, and maintenance contracts in partnership with the agency and, in some cases, to implement improvements directly.
- **Expand the DCR partnership office to capitalize on federal, state, and local funding.** A more robust partnership office, including project liaisons, grant writers, and legal staff, would boost collaborative efforts with outside partners that can identify and pursue additional funding sources for capital projects and programming, such as the state’s underused Municipal Vulnerability Preparedness (MVP) program, private philanthropy, and mitigation funds. Each public dollar invested in building the partnership office

can be multiplied by nonprofit partners to increase the resources directed to the state's public parks.

- **Build transparency and trust through clear, consistent communication.** Creating open lines of communication with the staff at every level will reduce inconsistent messages across partners, regions, and departments. Specifically, DCR should invest in improving its internal communication system, as it has done with its asset-management technology; provide more contact information; publish the organization chart on the website; provide customer-experience training for all staff; set standard response times for inquiries; and practice inclusive communication through multilingual signage, web content, and alerts.
- **Leverage nonprofit partners for community engagement.** DCR should lean on nonprofit partners and friends groups as both allies and liaisons within local communities, especially environmental justice communities, towards less confrontational and far more fruitful public processes. Most partners know the communities they serve and have achieved a level of trust and understanding that the agency cannot duplicate in a few public meetings. Working with groups anchored in the community will boost public confidence in the agency itself and its decisions.

By engaging partners and integrating them into the agency's culture and operations, DCR can increase the resources directed to the state's public parks and multiply the impact of essential tax-generated revenue. We need to work collectively to "grow the pie" for DCR, and we stand ready to do our part as the agency's partners.

**Further enable the Stewardship Council.** To make the Council as effective as possible and to help it discharge its core responsibility of approving the agency budget, DCR should fully integrate its input into the budgetary process. DCR must provide draft budget information to Council members well in advance of their review so that adjustments can be proposed, discussed, and resolved with DCR leadership prior to the Commissioner's submitting a final budget request to the legislature. The Council has also made significant progress in connecting and bringing attention to the work of DCR's partners across the Commonwealth and providing a platform and accountability for the development of Resource Management Plans. The Council and DCR would further benefit from having members directly appointed by friends groups, particularly from environmental justice communities. This would help reinforce our recommendations for improving DCR's public-private partnership structure, put those changes into effect, and deepen the Council's commitment to making the agency more equitable, internally and externally.

## **DCR SPECIAL COMMISSION NEXT STEPS**

The DCR Special Commission has begun the important work of identifying challenges and opportunities for improving one of our Commonwealth's most important agencies. The recommendations from the UMass Donahue Institute should not mark the conclusion, but the beginning of further study and action. As immediate next steps to make meaningful progress on our leading recommendations, the Executive Office of Environmental Affairs should work with the legislature to create a strategic action plan for DCR that includes:

1. **A data-driven budget.** To begin, the public and DCR stakeholders need to understand the aggregated, bottom line information from the agency's Asset Management Modernization Program (AMMP) so they can appreciate the scale of the problem we need to solve. Important economic indicators, such as spending per capita, operations, design, maintenance spending by park, and capital investment by park should be mapped and benchmarked against other states regionally and nationally to determine appropriate funding levels for the agency.
2. **Best practices for partnerships.** Similar park agencies across the country offer ample resources for building a successful public/nonprofit structure, such as the research, analysis and reports from the Trust for Public Land, National Recreation and Park Association, and City Parks Alliance. Further study

can provide DCR with strategies and tactics for meeting the recommendations outlined above.

3. **Accountability.** A DCR action plan should require regular evaluation and put in place systems of accountability. The Massachusetts Water Resources Authority offers an excellent local example with its annual public report summarizing investments made across the state. Regionally, the New York City Parks Department has a legislatively-mandated [Capital Project Tracker](#) that shows all current and planned investments and annual report on operations and maintenance activity, ensuring a transparent and equitable process for renovating parks.

As DCR's partners in protecting and improving open space, resource management, community engagement and climate justice, we remain committed to doing our part to support agency-wide improvement toward our common goals. We stand willing to contribute our time and experience and to help secure additional funding for the development of DCR's strategic action plan. We look forward to reviewing the forthcoming recommendations and collectively appeal to leadership in Massachusetts to support the action steps that DCR deserves and the Commonwealth needs.

Sincerely,



Laura Jasinski, Charles River Conservancy, DCR Special Commission Member with

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**Cc:**

Senate President Karen Spilka  
House Speaker Ron Mariano  
Senate Ways & Means Chairman Michael Rodrigues  
House Ways & Means Chairman Aaron Michlewitz  
Senate Environment Committee Chair Rebecca Rausch  
House Environment Committee Chair Carolyn Dykema

**DCR Special Commission:**

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