



October 28, 2021

Faye Boardman, Chair, DCR Special Commission
Massachusetts Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02144

Dear Chair Boardman,

Thank you, Chair Boardman, Commissioners, UMDI analysts and researchers, and DCR staff, for your earnest efforts to find a better way forward for the conservation and recreational needs of our Commonwealth; and for DCR to become a fully funded agency commensurate with its vast responsibilities.

On behalf of the Board of Directors of the Massachusetts Conservation Voters and its 5,000-voter network, we offer the following comments on the draft report and for its yet-to-be-written Executive Summary.

Culture

Since 1892 with the founding of what would become DCR more than a century later, we have recognized our most significant asset is the public lands we jointly own and freely access. As noted in both the Draft Report and by commenters, these lands hold priceless conservation value, are crucial for our citizens' physical and mental health (as proven during the pandemic) and are critical to the children of our state who, by accessing our parks, learn important social and conservation life lessons.

Much has been said at Commission hearings over the past nine months about the "culture" of DCR, notably that it lacks transparency. However, less was said about the culture of disinvestment that has led us to where we are today. Our state government's failure to recognize the importance of our public lands and financially support the agency that cares for these lands has severe consequences. Lack of adequate funding – last among states in the country, has brought us to a point where legislators seek open space and park improvements for their districts and their districts alone while ignoring the more significant funding necessary for the whole system. Inadequate funding to support the 450,000+ acres of the Commonwealth's public lands has created an unhealthy competition for dollars. As a result, less affluent areas of our state are left with deteriorated infrastructure. A demoralized DCR staff is left to scramble from one emergency to the next instead of leading our park system to meet the challenges of the 21st Century.

MCV is grateful to the Special Commission for casting a bright light on DCR's funding crisis because nothing will improve until our political leaders make our open spaces a funding priority and realize that the health of our citizenry, adapting to climate change, and healing our environmental justice communities are the challenges facing us today. An adequately resourced DCR will play an increasingly important role in meeting those challenges.

Funding – Balanced Budgets and Hidden Deficits

The root of the problems facing DCR is the continued disinvestment in our public open spaces. The enumeration of assets that DCR cares for is stated in the Commission Report and from commenters. Yet, today, an agency that receives less funding than it did a decade ago cannot be expected to even care for its assets from 2009, never mind the additional assets secured since then.

We believe there are three critical funding mechanisms that the Commission needs to highlight in its Final Report:

- Inadequate operating funding in the state’s annual budget
- Increasing demands to raise fees to support the park system (Retained Revenue Account)
- Insufficient yearly capital funding to erase the \$1.0 billion deferred maintenance backlog.

Operations funding for DCR parks is \$4 million less than a decade ago, and there are nearly 300 fewer staff positions than there were in 2009. Yearly funding and staffing have more to do with day-to-day DCR performance than any other metric. DCR has a professional and devoted workforce, but it is harried and overmatched by underfunding and increasing demands from the public. It is an agency with few legislative champions, yet it continues to perform its mission. For example, during the pandemic, DCR staff kept our open spaces free and open to all. The agency began social media alerts to users if a park was at capacity. It closed parkways for pedestrian use, all while facing the dangers of the pandemic to its workforce.

Each year DCR, in keeping with its public works responsibilities, keeps hundreds of miles of parkways, pedestrian walkways, and bike paths open during the winter months. In addition, it mobilizes each year for the summer season’s demands on its recreational resources. In countless ways, the fabric of the Commonwealth’s social needs and expectations results from the hard work of DCR professionals.

But performance does not translate to perception. A DCR that is underfunded and understaffed will always play catch-up to its responsibilities and receive criticism for what it isn’t doing. It’s a game of whack-a-mole, attend to a need in one place and ignore a need somewhere else.

MCV proposes that the Commission recommend a \$10 million increase each year for the next ten years to the DCR operating account (2810-0100) to fund ongoing operations while transitioning from an over-reliance on seasonal staff to full-time staff positions on the ground and its planning and engineering departments.

According to the Draft Report, retained revenue increased 20 percent over the past decade in a futile attempt to replace decreased general revenue funding - forcing DCR to spend time and money finding new ways to support the agency, time and money better spent serving the public and protecting our natural resources.

The recent paradox of new parking meters on historic parkways is worth noting. DCR decides under increasing pressure from the legislature and the Governor to fund its operations through the Retained Revenue account – it determines that parking fees on parkways are an underutilized funding mechanism – it invests countless hours in staff time, infrastructure purchases, and installation – in the face of opposition to

the new meters the Legislature passes a bill prohibiting new parking meters without local approval. DCR is left with losses in dollars, image, and morale. This must stop.

MCV asks that the Special Commission support a cap on retained revenue at \$20 million for the next ten years.

Capital funding finances new open space purchases, new construction, and existing infrastructure repair, and more. Over the past decade, the overall drop in capital funding has increased competition for dollars between new and existing needs. The recent example of the planned pedestrian bridge crossing the Mystic River connecting Assembly Square in Somerville to the Everett Encore Casino is a case in point. The Governor recently announced the plan and stated that “The bottom line is, whatever we don’t get from them (other funding sources), we’re going to fund.” DCR will assume responsibility for construction and future maintenance. Where does this money come from? The yearly capital funding allotted to DCR, thus pushing off \$37 million that might be spent on deferred maintenance to yet another year.

The Draft Report puts DCR’s annual capital spending at an average of \$117 million per year over the past decade. To continue new and needed capital needs and eliminate the deferred maintenance deficit, we urge the Commission to propose a yearly capital allotment of \$250 million per year for the next decade. And we urge the five-year capital spending plan to split that funding between new and existing capital needs. It’s time to stop the political culture of claiming a balanced budget each year while allowing a billion-dollar deferred maintenance backlog to continue and grow year after year.

The Strategic Plan and the Stewardship Council

MCV lauds the Commission’s recommendation for a strategic plan. It will become the public document that reveals DCR initiatives to the public and is supported by other ongoing efforts by DCR in its AMMP and RPM programs. The Strategic Plan needs funding and a public face. In its final report, we request that the Special Commission include a recommended FY23 and FY24 budget for the Strategic Plan. We also ask that the Special Commission recommend that the DCR Stewardship Council have direct oversight over the creation and implementation of the Strategic Plan. Finally, we would ask that the Stewardship Council make an annual report to the Legislature, the Governor, and the public on the status of the Strategic Plan.

We wish to particularly express our appreciation for recognizing that a strategic plan will guide future leadership at the agency. A plan that has undergone public discussion is a stabilizing force for a professional agency. DCR deserves nothing less. However, we urge the Special Commission not to tie immediate funding increases for DCR to the development and implementation of the strategic plan. The Special Commission Report documents the needs of the agency beyond any further study. We must start funding DCR immediately to improve the agency’s ability to perform its responsibilities.

Conservation and Recreation in the 21st Century

Many of our open spaces are wondrous and wild. Others are next door or in our community and offer daily respite and peace. We share mountains, valleys, lakes, streams, ponds, and ocean beaches because of the foresight and work of the giants who preceded us. It is our turn to do the work.

MCV believes that this report is the first step but must not be the final step in our conservation and recreation future. The snapshot that this report provides is a significant achievement and a guide for the future, but questions remain: what do conservation and recreation look like in 2050 and beyond.?

How have we protected our citizens from climate change, and what effect has it had on our natural resources?

Have our EJ communities emerged with greater open spaces, more tree cover, and seen increased health and less early mortality?

Do our parks have multimodal connections?

Have we finally reversed the course of the last two decades and made all our open spaces accessible and free for all?

Have we improved stormwater protections, eased flooding, and erased invasive species from our landscape?

And finally, has the work of the Commission in 2021 achieved a better funded, better performing, and stronger DCR?

MCV asks that you recommend a date certain for the next Special Commission to meet and assess DCR progress and further set a course for our health and welfare for our conservation and recreation needs. Again, we are grateful to you for taking the first step, and we ask you to ensure this is the beginning of a renewed interest and priority for our Commonwealth.

Thank you for your excellent work and for providing us the opportunity to comment on your draft report.

Very truly yours,

Chuck Anastas, Chair
Massachusetts Conservation Voters