

Charles River Conservancy  
All Dorchester Sports and Leadership  
Arborway Coalition  
Authentic Caribbean Foundation, Inc.  
Bay State Trail Riders Association, Inc.  
Berkshire Natural Resources Council, Inc.  
Bike to the Sea  
Blue Hill Observatory and Science Center  
Boston Harbor Now  
Brookline GreenSpace Alliance  
Charlesgate Alliance  
Charles River Watershed Association  
Emerald Necklace Conservancy  
Esplanade Association  
Friends of the Blue Hills  
Friends of Borderland, Inc  
Friends of the Boston Harbor Islands  
Friends of the Malden River  
Friends of the Middlesex Fells Reservation  
Friends of Nantasket Beach  
Friends of Walden Pond  
Friends of Wollaston Beach  
Green Cambridge  
Lawrence & Lillian Solomon Foundation  
LivableStreets Alliance  
Magazine Beach Partners  
Massachusetts Bicycle Coalition  
Massachusetts Conservation Voters  
Massachusetts Land Trust Coalition  
Massachusetts Rivers Alliance  
Muddy Water Initiative  
Mystic River Watershed Association  
Neponset River Greenway Council  
Neponset River Watershed Association  
Newton Conservators  
Southeastern Massachusetts Pine Barrens Alliance, Inc.  
Southwest Corridor Park Conservancy  
Speak for the Trees, Boston  
WalkBoston  
WalkMedford

November 1, 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

Dear Secretary Theoharides,

Thank you for the dedication demonstrated by you and your colleagues at the Executive Office of Energy and Environmental Affairs, the Department of Conservation and Recreation and the UMass Donahue Institute on the DCR Special Commission draft report. We are especially grateful for the team's commitment to robust public engagement throughout this process and responsiveness to Commissioners' requests, such as the addition of a meeting for Commissioner discussion and deliberation on the draft report. The following comments come from a position of respect and appreciation for the team that has risen to the challenge of recommending opportunities to *improve the management, operations and asset condition of the natural, cultural and recreational resources held by the Department of Conservation and Recreation.*

As a group of DCR's 120+ Friends' Groups and partner organizations, we continue to be invested in the agency's success and represent tremendous potential for advocacy, volunteering, community engagement and fundraising to support the recommendations of the DCR Special Commission report. Not only will this document be an important foundation for long-term improvement of the DCR's effectiveness, it will also chart the direction and next steps of our collective action. We appreciate the opportunity to submit the following comments to improve and clarify the report towards broad and systematic change. We do so in support of our colleagues within the agency, who have made do with too little for too long and who deserve the necessary resources to fulfill their essential mission.

**Above all we believe the report correctly identifies the need for deeper investment in DCR: "relative to its population, income, and total government spending, Massachusetts' local and state investments in parks and recreation are at or near the bottom of all states," (p.27). This should serve as a wake-up call to Massachusetts residents, business leaders and elected officials. The need for investment in our natural resources and public parks is urgent, and we must respond by ensuring DCR is fully equipped to meet today's climate change and equity challenges.**

#### DCR Special Commission Draft Report Comments

**1. Provide an Executive Summary that prioritizes recommendations.** The task assigned to the Commission, *to improve the management, operations and asset condition of the natural, cultural and recreational resources held by DCR*, was a significant undertaking and unsurprisingly yielded a dense, 100+ page report. To effectively provide a road map for next steps, we ask UMDI to summarize findings and clarify priority action items up front.

**2. We agree that a strategic plan is critically important for DCR to address agency culture, perception, align operating and capital budgets, and emerge as a better-structured, well-resourced agency. To ensure the best possible outcome, the report should be more explicit about best practices and processes for the development of SMART goals as part of the strategic plan.**

- **Define upfront investment needed for strategic planning:** DCR does not currently have the staff and resources to undertake this important capacity-building project. We ask for the report to outline staffing, contracting, and a realistic timeline for execution based on comparable, agency-wide processes within and beyond Massachusetts. This information will enable DCR partners to advocate for and contribute resources to this effort.
- **Define best practices for the strategic planning process:** The report should describe a reasonable scope for a DCR strategic planning process that includes agency-wide participation, opportunities for public input and the development of SMART goals (Specific, Measurable, Achievable, Realistic and anchored within a clear Time Frame). The current structure of the Special Commission provides a good model for regular feedback. DCR should build on this framework by appointing and regularly convening experts that represent their diverse, statewide partners and constituents throughout the strategic planning efforts.
- **The strategic plan must address equity, access, and climate preparedness:** The lack of discussion in the draft report on DCR's role in advancing equity and access is concerning, as is the limited discussion of the vitally important role DCR plays in climate preparedness. In addition to providing more information in the report on DCR's current practices, it must define equity and resilience as focus areas for the strategic plan.

**3. We appreciate and support the recommendations for DCR to better leverage Friends' Groups and present the following clarifications for inclusion in the report.** These updated recommendations should be acted upon immediately to greatly improve the functionality of DCR's public-private-partnerships (PPPs) and increase resources directed to the agency.

- **The recommendation to "increase leveraging of stakeholder partnerships to enhance facility infrastructure, maintenance, and operations," (p.85) should include specific provisions to improve the Memorandum of Agreement (MOA).** As detailed in our June letter, the current draft MOA fails to recognize some of the essential functions of nonprofit partners or mitigate the significant permitting burden for each event held by a Friends' Group. This effectively excludes nonprofit partners without paid staff, which is a significant portion of the agency's 120+ partners, from stewarding and programming their state parks and limits important stewardship activities (i.e. invasive species removal). The proposed term limit of five years also limits significant capital improvements from Friends' Groups and other partners. The report should recommend that the MOA further reduce red tape, streamline approvals for nonprofit partners, and extend the time horizon to reasonably increase their ability to protect, improve and activate their local state parks.
- **The recommendation to "increase the number of and train DCR staff who work with Friends' Groups at ground level," (p.86) should specify the number and roles of additional staff.** The recommendation for a DCR ombudsman is a good starting point. With 120+ partner organizations, this would be most effective at the regional level, which DCR defines by five geographies. These positions should be given decision-making power for partner activities in programming, operations and maintenance. The report should also recommend that a more robust partnership office include project-specific liaisons, legal staff, and grant writers to capitalize on federal, state, and local funding. Additionally, job descriptions and performance reviews for positions that interface directly with Friends' Groups should include language and metrics for partnership evaluation.

- **The recommendation to “increase DCR Partnership Matching Funds,” (p.86) should also include improvements to program administration.** We agree that a larger funding pool would help leverage additional private funding via Friends’ and partner organizations, but the program must be more equitable and accessible to partners with fewer financial resources. Partners are often significantly invested in their proposals to the DCR Partnership Matching Funds program and can serve as more than a financial intermediary. The program would be vastly improved and made more efficient by allowing partners to receive funding and participate in and/or lead project management. Projects funded through this program often suffer from the lack of DCR staff capacity, resulting in delays and missed objectives. Additionally, partners cannot track the use of privately-contributed funds, resulting in a lack of accountability, which jeopardizes repeat, future private contributions. Partner organizations with fewer resources would also benefit from a technical assistance component for park improvement projects, similar to the Urban Forestry Program. This would ensure that communities who are not as well-resourced have the opportunity to improve their parks and natural resources thus expanding equity and access.
- **Additionally, we are concerned with the narrow definition of partnerships in the report and see further opportunity to leverage and expand PPPs based on proven models.** Financial support is an important service that partner organizations provide, but it is not the only asset to the DCR. Leveraging local knowledge and relationships of public and private partners - which includes Friend’s Groups as well as nonprofit organizations, municipalities and other state agencies - in decision-making will encourage authentic transparency and community engagement, boost confidence and support for the agency as well as “speed processes and decision-making for improvements,” (p.85). The report should recommend a formalized process for DCR to use partners as community liaisons and as a part of regular planning activities and evaluations to ensure more effective, efficient implementation of capital projects and maintenance.

The report does not reflect any research into successful models of PPPs between state agencies and park nonprofits, which was suggested as a key next step in our June letter. There has been significant movement across the country towards government agencies developing relationships with Friends’ Groups to stretch government resources farther and wider, in many cases allowing deeper investment into environmental justice communities. The report should offer clarity on the structure of strong PPPs, as documented by the Trust for Public Land, National Recreation and Park Association, and City Parks Alliance, and recommend DCR modernize their approach to enabling Friends’ Groups to support our state parks system.

**4. We are concerned that the report relies on incomplete information, systems and inflated achievements and ask for the report to go further and/or clarify limitations.** In support of these recommendations and a strategic planning process, the report needs to provide a more accurate depiction of the agency’s starting point. We ask EEA and UMDI to address and clarify the following areas of analysis.

- **DCR Return on Investment:** It is important to note that the practice of quantifying the value of public goods is inherently problematic and challenging. Given the explicit direction for the Commission to do so, we appreciate UMDI’s efforts to lay out their approach and findings, but advocate for further work to provide a more complete analysis of climate and ecosystem benefits as well as quality of life and public health benefits, which has been highlighted and well-documented throughout the COVID-19 pandemic. In addition to resources shared by several Commissioners, we recommend the team review and incorporate the [Tree Equity Score](#) by American Forests and work by John L. Croptom, [The Proximate Principle: The Impact of Parks, Open](#)

[Space and Water Features on Residential Property Values and the Property Tax Base](#), as well as "[Reports and Tools](#)" from the City Parks Alliance.

- **CAMIS/AAMP:** The Commission's stated purpose *to improve ... the asset condition of the natural, cultural and recreational resources held by DCR*, requires more rigorous evaluation and recommendations regarding DCR's asset management system. CAMIS and AAMP, individually and used together, are referenced several times in the report as the foundation for improved DCR asset management. We appreciate the progress that has been made, but relying on a system that has not been fully implemented across DCR regions raises concerns and questions of efficacy (p.12). The report should clarify what is needed to make the system fully operational, who is in charge of implementation, what it will cost, if a facility condition index system (FCI) has been defined, and what constitutes an asset in "good repair." Additionally, a key question the report should address is if/how primary assets like trees, landscapes, impervious surfaces, waterways and parkways will be included. These recommendations are needed in order to fulfill the Commission's mandate and determine if CAMIS/AAMP is the best system for DCR's statewide asset management.
- **Parkways Master Plan:** The report presents the release of the Master Plan as an important achievement and example of transparent planning, but this is disingenuous. The Master Plan excludes several key parkways (i.e. Soldier's Field Road, Storrow Drive, Memorial Drive, Alewife Brook Parkway and the Arborway), is not based on the best available crash data, lacks metrics for tracking progress, did not allow for public comment/engagement in its creation, and was released years after completion, seemingly only after the submission of a Freedom of Information Act request, followed by negative press. Inclusion of the Master Plan in the "DCR's Response to Challenges" section unfairly represents its merit, and we ask for it to be recharacterized in the report.
- **Resource Management Plans:** The report does not provide a complete history or current status of the RMP program and thus misses important conclusions and recommendations. DCR's severe backlog in completing RMPs is tied to inadequate staffing levels in its planning unit, leading to the development of a "streamlined" RMP process to speed up completion and meet its legislative mandate. However, the simplified process has created a "one size fits all" template that cannot accurately capture DCR's wide variety of property and resource areas and has weakened the agency's land stewardship practices, such as on-the-ground data collection by trained biologists. Instead of truncating the process, the DCR strategic plan should determine the staffing and budget needed to implement best practices in RMP development and tracking. Given the property-specific scale of RMPs, it is especially critical that they are developed and evaluated in partnership with local Friends' Groups and municipalities.

**5. We support the recommendation to retain parkways within DCR, but the report and Master Plan fall short of outlining necessary actions to address urgent safety concerns and deferred maintenance.** We agree with the assessment that "although MassDOT possesses a comparatively much larger budget,....[it] may not necessarily have the capacity to handle the specific responsibilities of parkways," (p.58). Transferring assets from one agency to another does not necessarily solve issues of speed, safety, and lack of access to greenspace. To realize and protect the original intention, recreation, and aesthetic qualities of parkways, we need to assess and improve the policies that govern them as well as ownership. We still have real concerns with DCR's capacity and approach to parkway management and ask for the Special Commission report to include the following in support of the recommendation:

- Further work on the Parkways Master Plan to address missing assets and parkways.

- More stringent safety requirements, such as a mandate for DCR parkway design and management policies to comply with MassDOT Separated Bike Lane Planning and Design Guide (2015) and MassDOT’s Municipal Resource Guide for Bikeability (2019).
- Implementation of safety design improvements on DCR Parkways with the highest crash rates and those with multiple serious injuries or fatalities involving pedestrians and cyclists.
- Investment in a more accessible, better resourced “Green Transportation Department,” including hiring more engineering staff with experience in Complete Streets design to be able to implement the Parkways Master Plan and other safety and accessibility improvements.
- Utilization of partners, such as the existing Urban Parks and Pathways Committee (UPPC), for regular collaboration and accountability.

Thank you for your consideration of these comments and work to ensure that the DCR Special Commission report is a robust tool for advocacy and action. We remain committed to doing our part to support agency-wide improvement toward our common goals and truly hope the DCR Special Commission report is the beginning of ongoing conversation and action, rather than the end. We stand willing to contribute our time and experience and to help secure additional funding for the development of DCR’s strategic action plan.

Sincerely,



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

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|---|--|--|
| Charles River Conservancy                 | Esplanade Association                      | Massachusetts Land Trust Coalition                     |
| All Dorchester Sports and Leadership      | Friends of the Blue Hills                  | Massachusetts Rivers Alliance                          |
| Arborway Coalition                        | Friends of Borderland, Inc                 | Muddy Water Initiative                                 |
| Authentic Caribbean Foundation, Inc.      | Friends of the Boston Harbor Islands       | Mystic River Watershed Association                     |
| Bay State Trail Riders Association, Inc.  | Friends of the Malden River                | Neponset River Greenway Council                        |
| Berkshire Natural Resources Council, Inc. | Friends of the Middlesex Fells Reservation | Neponset River Watershed Association                   |
| Bike to the Sea                           | Friends of Nantasket Beach                 | Newton Conservators                                    |
| Blue Hill Observatory and Science Center  | Friends of Walden Pond                     | Southeastern Massachusetts Pine Barrens Alliance, Inc. |
| Boston Harbor Now                         | Friends of Wollaston Beach                 | Southwest Corridor Park Conservancy                    |
| Brookline GreenSpace Alliance             | Green Cambridge                            | Speak for the Trees, Boston                            |
| Charlesgate Alliance                      | Lawrence & Lillian Solomon Foundation      | WalkBoston   |
| Charles River Watershed Association       | LivableStreets Alliance                    | WalkMedford  |
| Emerald Necklace Conservancy              | Magazine Beach Partners                    |  |
|   | Massachusetts Bicycle Coalition            |  |
|   | Massachusetts Conservation Voters          |  |

**Attached:** DCR Friends Group Letter to Secretary Theoharides re Special Commission Recommendations\_6.21.21

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

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Friends of the Mount Holyoke Range

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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

Charles River Conservancy	Friends of the Middlesex Fells Reservation	Neponset River Greenway Council
Arborway Coalition	Friends of the Mount Holyoke Range	Neponset River Watershed Association
Bike to the Sea	Friends of Walden Pond	New Brook Farm, Inc.
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Boston Cyclists Union	Green Cambridge	RESTORE: The North Woods
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Friends of the Boston Harbor Islands	Muddy Water Initiative	
Friends of the Malden River	Mystic River Watershed Association	

**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:**

Representative Norman Orrall  
Commissioner Jim Montgomery  
Administrator Jonathan Gulliver  
Nathan Peyton  
Nate Walton  
Kate Bowditch  
Buzz Constable  
Heather Clish  
Guadalupe Garcia  
Mary Clutchey  
Fran Blanchard  
Karen Mauney-Brodek

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