



MASSACHUSETTS WATER RESOURCES AUTHORITY

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Submitted via email at guidelines@mass.gov

Subject: Recommendations for Climate-Oriented Forest Management Guidelines

To Whom It May Concern,

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the *Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines*. The guidelines will aim to provide science-based guidance on managing state lands and incentives for private landowners to maximize carbon storage, sequestration and overall climate resilience. MWRA supports the goal to make our forests more resilient to climate change and maximize carbon storage and sequestration, and looks forward to continued participation as State agency implementation plans are developed to ensure that forest management achieves the goals and benefits of multiple purposes simultaneously.

As noted in the report, the Climate Forestry Committee (CFC) was split on the role of active forest management in support of public water supply management and requested that the Commonwealth articulate the rationale for active management on Division of Water Supply Protection lands. For many decades the Department of Conservation and Recreation (DCR) and its predecessor agencies have maintained an active land acquisition and forestry management program within the lands owned for watershed protection around MWRA's source waters. MWRA provides drinking water from the Quabbin and Wachusett Reservoirs in central Massachusetts, with source waters located in the Quabbin, Wachusett and Ware River watersheds. MWRA views these programs as essential parts of MWRA's watershed and source water quality protection. The land acquisition program has resulted in an increase in the amount of protected (undeveloped) land. The current watershed forest management program is designed and operated for the specific purpose of maintaining a multi-aged and multi-class forest to protect MWRA's source water quality.

MWRA relies on the protective attributes of the forest as a critical component of its watershed protection efforts, and is judged annually by state and federal regulators on the ability of its protection efforts to reliably ensure high quality source water. MWRA is one of the few water systems nationwide with water sources that consistently deliver high quality water and are sufficiently well protected naturally such that the USEPA and MassDEP regulations allow MWRA to provide only primary disinfection of the water. This avoids the use of chemically enhanced filtration with its energy-intensive processes and associated carbon footprint.

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The forestry program and overall forest management approach contained within DCR's 2017 Land Management Plan¹ satisfies MWRA's interest in assuring that DCR's forest management programs are building a resilient forest and protecting reservoir water quality in both the short term and the longer term and should be allowed to continue without change. These programs have resulted in an increase in protected (undeveloped) land which are an integral part of the overall watershed protection efforts. This has enabled MWRA to maintain its Filtration Avoidance determination from MassDEP and the US EPA since inception. This determination avoids not only the potential for a capital expense of hundreds of millions of dollars, but also a substantial increased use of energy and chemicals, and production of greenhouse gasses associated with a filtration plant. Additionally, a diverse and resilient forest allows for greater carbon storage.

MWRA looks forward to continued participation as the State develops plans to implement recommendations of the report.

If clarification is needed on any of these comments, MWRA would be happy to provide additional detail or respond to any questions. Feel free to contact MWRA's Director of Planning and Sustainability, Stephen Estes-Smargiassi at smargiassi@mwra.com.

Sincerely,



David W. Coppes, P.E.
Chief Operating Officer

Cc: Fred Laskey, Executive Director
Matthew Romero, MWRA Advisory Board Executive Director
Colleen Rizzi, Director of Environmental and Regulatory Affairs

¹ **Land Management Plan**, Division of Water Supply Protection, Department of Conservation and Recreation, 2017
www.mass.gov/doc/2017-dcr-division-of-water-supply-protection-2017-land-management-plan/download