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Frederick A. Laskey
Executive Director
Massachusetts Water Resources Authority
Charlestown Navy Yard
100 First Avenue
Boston, MA 02129

Fred
Dear Mr. Laskey:

This letter, which I write in my capacity as both Secretary of Environmental Affairs and as Chairman of the Massachusetts Water Resources Authority (MWRA), is prompted by recent actions pertaining to the admission of communities to the MWRA water supply system. Over the last decade a number of communities have been added to the system, and there are presently several communities that either have pending applications or have expressed interest in gaining admission.

By writing this letter I am not endorsing or discouraging any particular admission request. Rather I am drawing attention to the stewardship responsibilities shared by all public officials that must serve as bedrock for consideration of all admission requests. While this letter is prompted by the potential expansion of the number of communities supplied by the MWRA water supply system, the message I deliver pertains to the potential expansion of, and the ongoing operation of, both the MWRA's water supply and wastewater systems.

The Commonwealth has the good fortune to have abundant rainfall, approximately 45 inches a year. Abundant rainfall, however, does not guarantee an inexhaustible supply of drinking water. Local growth can outstrip local supplies. This accounts for why our forebears incurred the significant cost and sacrifice to build the Quabbin-Wachusett water supply system to meet the water demands of the Boston metropolitan area. Furthermore, the manner in which we grow can impact water supply and demand. Development can

either foster or interfere with aquifer recharge, and development can either set in motion consumptive or conservation-minded water usage. A recent study by the Metropolitan Area Planning Council (MAPC) indicates that 51 communities, comprising nearly half of the 104 local water systems surveyed by MAPC in eastern Massachusetts, may exceed their existing (2006) Water Management Act withdrawals by 2030. This could be reduced to 33 communities, with the implementation of water conservation measures.

The Quabbin-Wachusett water supply system is an engineering marvel that is now the primary responsibility of the MWRA, with the Department of Conservation and Recreation, as the owner of the reservoirs and the lands surrounding them, playing a vital role in protecting these resources. Engineering marvel though it may be, the Quabbin-Wachusett water supply system carries water that is a natural resource of the Commonwealth, and the state officials whose responsibilities include the operation of this system are stewards of this vital and finite natural resource. Stewardship of this natural resource by state officials is required by Article 97 of the Amendments to the Massachusetts Constitution, which establishes that the "protection of the people in their right to the conservation, development and utilization of the agricultural, mineral, forest, water, air and other natural resources is hereby declared to be a public purpose." In the context of MRWA expansion policy, stewardship means that the MWRA must manage the water resources under its control for the greater good of the Commonwealth, balancing our short and long term needs for water supply, economic growth, and the viability of the natural resources upon which we depend.

I recognize that this is a considerable challenge for the MWRA. I am mindful of the pressure that the Authority will experience from towns seeking admission and ratepayers seeking relief from rising water and sewer rates. I believe, however, that the MWRA can rise to this challenge, as it is an Authority that since its inception nearly twenty five years ago has accepted and risen to meet great challenges. The MWRA's successful construction of the Deer Island Sewage Treatment Plant and Outfall Tunnel, along with a series of major improvements to the water system – the Metrowest Supply Tunnel, the new John Carroll Water Treatment Facility in Marlborough, and a set of covered drinking water storage facilities including the immense Norumbega covered storage facility in Weston – evidence an agency with an outstanding record of infrastructure improvements. The MWRA has contributed to the remarkable decrease in the demand on water from the Quabbin-Wachusett water supply system from approximately 340 million gallons a day in the 1980s to approximately 225 million gallons a day today. The MWRA has also invested millions of dollars to address the combined sewer overflow problem, and has also invested substantially in, and spurred municipalities to address, infiltration and inflow into its sewer system.

The challenge facing the MWRA of managing the water resources under its control for the next twenty-five to fifty years will be a challenge of a different nature. The challenge now facing the Authority will require it to more actively engage with other state agencies, the legislature, regional planning organizations and municipalities to manage these water resources in concert with a host of other important state, regional and municipal

objectives such as natural resource protection, economic development, and housing production.

The Authority has stated that we have a surplus of water in the Quabbin-Wachusett water supply system, taking into account projected growth in demand by existing MWRA communities through 2030, and that the Quabbin Reservoir represents a five-year reserve. While a surplus and a reserve are reassuring, neither is infinite. Moreover, in this era of global climate change it would be unwise to assume that historic precipitation and retention rates will continue in the future.

Any water from the Quabbin-Wachusett water supply system that is properly characterized as “surplus” should be allotted with great care. To begin with, there is the issue of the health of the water resources in the donor basins, in particular the downstream flows of the Nashua River and the Swift River. These rivers, while no longer in their natural state, should be allowed sufficient flows to ensure that the riverine system is robust. Additionally, there is the concern that there be adequate supply to accommodate future sustainable growth in communities of the reservoirs’ watersheds.

As for the potential receiving communities, I agree that, in certain circumstances, the MWRA can and should play an important role in relieving highly stressed river basins by providing drinking water and allowing towns to stop or reduce drawing drinking water from those stressed basins. I believe that Reading, which has applied to receive all of its drinking water from the Authority, may represent a case in point. Located at the headwaters of the Ipswich River, the state’s most stressed river, Reading had been drawing most of its drinking water from its watershed. Reading has an exemplary water conservation program and the town is largely built out (under current zoning). Reading is the sort of town that the MWRA should be in a position to serve and assist in improving the watershed conditions by providing water, provided that the town continues to demonstrate its commitment to using water wisely.

To be in a position to serve the towns that are most in need in the future, it is crucial that the MWRA resist a “first come, first served” approach. It is equally crucial that in meeting the needs of a town under circumstances such as those presented in the case of Reading, that the message not be conveyed that if a town lets things get very bad, then the MWRA will come to the rescue and supply water. Indeed, the opposite message – that one of the preconditions of MWRA service is that towns do a number of things well, including comprehensive conservation measures and managing growth responsibly – must be communicated.

It is also important to recognize explicitly that by controlling the allocation of drinking water as well as wastewater capacity, the MWRA is in a position to influence where in the Commonwealth there is capacity for growth. Just as a new highway or transit line can influence growth, so can the provision of drinking water or wastewater service. Before admitting a community to water or wastewater service, the MWRA needs to have a very good idea of where that community is going in terms of its stated growth objectives and likely growth outcomes based on its zoning and development potential.

The MWRA, just like the transportation agencies, needs to work with other state agencies, the legislature, regional planning agencies, and municipalities to ensure that the "indirect growth" impacts of water and wastewater projects are consistent with state sustainable development policies.

For both water supply and wastewater service, given the significance of the admission decision to the water resources in the donor basin, to our ongoing ability to respond to the capacity needs of our communities, and to the sustainable development of the Commonwealth, it is understandable that the MWRA's enabling legislation requires that no new local body be added to either the water or sewer service areas without prior approval of the governor and the legislature. (See Chapter 372 of the Acts of 1984, Section 8(c) & (d).)

Once a town has been admitted to either the MWRA's water supply or wastewater service, the state has a strong ongoing interest in the water conservation practices and future growth of that town. While it is true that rising rates provide a market signal to conserve, the MWRA on behalf of the Commonwealth must require conservation measures as a condition of service and must work with communities to ensure that future growth and associated water and sewer demand will be consistent with state sustainable development objectives. These issues will also be under consideration when the Massachusetts Department of Environmental Protection is asked to renew MWRA's water withdrawal registration in 2008.

In conclusion, the challenge facing the MWRA over the next twenty five years and beyond is fundamentally the challenge of integration. MWRA is the state agency that is the steward of the waters of the Quabbin-Wachusett water supply system, but it cannot make decisions on admission, or on what to require of existing users, in isolation. These water resource management decisions must be made in close coordination with other governmental bodies and interested parties so that we, as one Commonwealth, move closer to our interconnected environmental, economic and social goals. To successfully meet this challenge, the Authority will need to enter the sometimes messy fray of developing common purpose with a range of different and sometimes competing interests and concerns. Compounding these challenges is the need to coordinate the various local and state processes to ensure that decisions can be made in a timely and efficient manner. EOEA and its agencies have the responsibility for improving the efficiency of the review process. The MWRA and its dedicated workforce, through your leadership and the Board's commitment to excellence, continue to deliver remarkable results. I am confident that the MWRA is up to this challenge, and that the Commonwealth – its people and its natural resources – will be the clear beneficiaries of its efforts.

Sincerely,



Robert W. Golledge, Jr.
Secretary

cc: MWRA Board Members
Water Resource Commission Members
Commissioner, Department of Environmental Protection
Commissioner, Department of Conservation and Recreation

