



## **Charles River Watershed Association**

May 16, 2006

*RE: Massachusetts Water Works Association White Paper*

### **To the Massachusetts Senate:**

The Massachusetts Water Works Association (MWWA) in its recent *White Paper*, dated April 25, 2006, cherry-picked watershed science in an attempt to underpin its contention that Massachusetts Department of Environmental Protection (DEP) water management act policy is unjustified. Most Americans understand the issues surrounding resource depletion and recognize that conservation of critical resources is central to sustaining them. Evidently, the MWWA is not interested in the careful husbandry of critical water supplies, preserving Massachusetts riverine habitat, nor participating in the kind of infrastructure change this state must initiate to protect and enhance potable water resources while restoring natural river flow.

Further, MWWA claims that it has not had the opportunity to discuss or influence DEP water management act policy are without merit. In negotiations with MWWA and the Massachusetts Municipal Association, DEP wrote guidance for implementation of its policy that gives water suppliers effectively five years to meet the new standards. It should be noted that 67 percent of state municipalities already meet the new standards. DEP also set aside its seasonal cap on withdrawals in deference to regions like Cape Cod, where summer tourist demand far outstrips winter demand.

The watershed science on which DEP's water withdrawal policy is based is among the best and most extensive for any region in the United States. Should the legislature pass legislation encumbering DEP water withdrawal permit policy, they will put at risk *short term* water resource viability, and certainly doom many eastern Massachusetts streams and rivers to continued and increasingly extended periods of *no flow at all*.

Water withdrawal for potable uses and irrigation is not the only cause of stressed conditions in our streams and rivers, but it is one of three major contributing factors. The other two include the growth of constructed surfaces impervious to rain, and the collection and discharge of wastewater far from the source of that water. The notion, however, promoted by MWWA in its *White Paper*, that water withdrawal from local

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sources for human use has no impact on surface water bodies is simply wrong. In fact, *the scientific proof that local water withdrawals have significant impact on the viability of Massachusetts' surface water bodies is overwhelming.*

Water suppliers have had 14 years since the Massachusetts Water Resources Commission first introduced its water conservation standards governing interbasin transfers. They have had five years since the Commission introduced its Interbasin Transfer Performance Standards, including goals of 65 residential gallons per capita per day, and 10 percent unaccounted for water for distribution systems, numbers identical to those adopted in the new DEP policy in 2004. What have they done? With a very few notable exceptions, they continue to advance the notion that their withdrawals have no impact.

Attached is a complete, though hardly exhaustive, discussion of the real science surrounding the use of water in Massachusetts. Should the reader be interested, the references list includes the exhaustive studies done in Massachusetts on water use and sustainability.

I would also recommend that senators and their staffs review the attached graphics developed by the Metropolitan Area Planning Council depicting water depletion by town over eastern Massachusetts from 2000 through 2030. Running out of potable water supply will not be cheap, the damage to the natural environment is already catastrophic and will grow, and the political fallout from both is likely to be quite high.

Conservation, now, is essential.

Sincerely,

Robert L. Zimmerman, Jr.  
Executive Director