



MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Frederick A. Laskey
Executive Director

Telephone: (617) 242-6000
Fax: (617) 788-4899
TTY: (617) 788-4971

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Kathleen Baskin, P.E.
Director of Water Policy
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th floor
Boston, MA 02114

Dear Ms. Baskin:

Thank you for the opportunity to provide comments on the Executive Office of Energy and Environment's Sustainable Water Management Initiative (SWMI) Framework. The Massachusetts Water Resources Authority was pleased to be invited to participate in the SWMI Advisory Committee and appreciates the effort of the state's environmental agencies in involving a wide range of stakeholders in the process. MWRA's water sources are registered, and are thus not directly affected by the elements of the framework as developed, but as the state's largest water supplier, MWRA is a key stakeholder and our water resources play an important role in any state water policy.

The work done over the past two years by the state's environmental agencies and by USGS has clearly provided a much more robust basis for policy decisions. While not all stakeholders appear to be in full agreement with every aspect of the data and models or how they were used in the framework, it is clear that both land development (as measured by percent of impervious coverage) and water withdrawals affect the quality of the river environment. Our own experience in protecting the watersheds around the Quabbin and Wachusett reservoirs bears this out.

MWRA has been a leader both in Massachusetts and nationally in developing and implementing demand management programs to reduce water withdrawals. MWRA's demand has dropped from approximately 340 million gallons per day (mgd) in 1980 to approximately 200 mgd today. These reductions have been accomplished in concert with providing service to additional customer communities and thereby reducing their withdrawals from locally stressed basins. Providing service to Wilmington and Reading in the headwaters of the Ipswich River has already had a positive impact on that river system. Similarly, providing service to Stoughton and the Dedham-Westwood Water District has allowed those communities to continue to grow and develop economically without further stressing the Neponset River.

Our successful demand management programs mean MWRA has water available to assist more stressed basins. A regional solution to local water management issues makes sustainable

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water resource policy sense and was recently endorsed by the Water Infrastructure Finance Commission in its draft report. MWRA sources are less environmentally harmful than withdrawals from many local sources in stressed basins because of MWRA's reduced reservoir withdrawals; the reservoirs' ability to retain water from average and wet years for use in dryer periods; and the regular releases MWRA makes to downstream rivers even during drought periods.

MWRA notes that the proposed approach to defining the benefits of reservoir storage within the Safe Yield definition appear to be appropriate given the statutory definition of Safe Yield.

While it is clear that use of the regional system can be an environmentally sound solution for some communities' water supply needs, it is also clear that there are financial barriers to community acceptance of regional solutions. MWRA is evaluating how to reduce these financial barriers to entering the MWRA system in ways which are equitable to our current ratepayers, but it also appears that in some cases state support for needed infrastructure may be necessary. As EEA is finalizing the SWMI framework, it is critical that the financial issues receive as much attention as the environmental issues.

In addition, in the past, the regulatory process for resolving local water resource problems with regional solutions has been costly and time consuming. Communities have been rightly concerned about entering a lengthy process with an uncertain outcome. Institutional barriers, such as the Interbasin Transfer Act and the complexity of MEPA can be overcome, but clear signals from permitting agencies about local options are necessary to facilitate environmentally appropriate decisions. If it is clear from the SWMI framework and eventual regulations, and from the guidance and direction provided by DEP and DCR staff, that continued or additional use of a particular local water resource is environmentally infeasible, communities will feel more confident in exploring other solutions.

In conclusion, it appears that the proposed Sustainable Water Resource Initiative Framework represents an important step forward in state water resource planning. MWRA and our well-protected and ample regional water supply reservoirs can be a significant part of the solution in some river basins, but to do so effectively may require financial assistance to the affected communities and additional streamlining and clarity in the regulatory process. MWRA stands ready to help move the SWMI process into implementation.

Sincerely,



Frederick A. Laskey
Executive Director