



CONNECTICUT RIVER WATERSHED COUNCIL
Protecting the Connecticut River Since 1952

15 Bank Row, Greenfield, MA 01301

March 22, 2006

Frederick A. Laskey, Executive Director
Stephen R. Pritchard, Chairman of the Board of Directors
Massachusetts Water Resources Authority
Charlestown Navy Yard
100 First Avenue
Boston, Massachusetts 02129

Subject: Marketing MWRA Water to New Communities

Dear Mr. Laskey, Mr. Pritchard, and the MRWA Board of Directors:

I am writing on behalf of the Connecticut River Watershed Council (CRWC) to express serious concern about the MWRA's proposal to sell "surplus" water to communities outside its service area in the hope of cushioning customer rate increases in coming years. CRWC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River watershed. We have long been a member of the Water Supply Citizens Advisory Committee (WSCAC), and have followed this issue of interbasin transfer since the mid-1960's when the "Northfield Diversion" of the Connecticut River was proposed. Though the MWRA is to be applauded for its successful measures in improving water use efficiency, we are very concerned that the proposed use of saved water would be to sell it to others rather than to better manage downstream releases. We think that the negative impacts of a decision to sell more water could be significant and we urge the MWRA to either reject this proposal or study it in full before making a decision.

Quabbin water diverted to the Boston area comes from the Connecticut River watershed. The Connecticut River is a water-quality impaired river along its entire stretch in Massachusetts, especially in the Chicopee, Holyoke, and Springfield areas. Greater releases of clean water from the Quabbin would help dilute the polluted water that our urban residents and visitors use for boating, fishing, and swimming. Unfortunately, according to Table 4 of the draft Quabbin Public Access Plan prepared by the Massachusetts Department of Conservation and Recreation, *the Quabbin loses more water to evaporation each year than to downstream release* (44 vs. 27 mgd annual flow).

CRWC believes that the MWRA's first responsibility in times of reduced demand should be to the downstream reaches. Figures 8 and 9 in the Executive Office of Environmental Affairs "Chicopee River Comprehensive Watershed Assessment 2003," demonstrate that dramatic changes in the natural flow regime of the Swift River have happened since the Quabbin reservoir was created (page 12 of http://www.mass.gov/envir/water/publications/Chicopee/Chicopee_Assessment_Report.pdf). We urge the MWRA to return more water to the Chicopee watershed. We would be willing to work with the MWRA and other environmental interests to achieve an agreement about downstream releases.

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In addition to environmental effects in the donor watersheds, the proposal, if carried out, will set a major and negative environmental precedent. This is a matter of great public importance involving a precious public trust and it requires balanced, careful review and input from a broad array of stakeholders. The creation of the Quabbin Reservoir expanded the “carrying capacity” of the Boston area, and helped make Boston a thriving city rich with culture, technology, industry, and many people of all backgrounds. Should the MWRA service area be further expanded, it will likely increase the “carrying capacity” of communities outside the Boston metropolitan area, perhaps affecting the character of the entire state through increased development.

The question of which communities would get the water raises many issues. The availability of additional water will influence communities’ decisions about sustainable development, resource protection, affordable and market-rate housing, and transportation. Who will decide which communities should get tax revenue through newly-enabled commercial or industrial growth? A “first come first served” approach cannot lead to reasoned decision-making, or long-term benefit. The proposal under discussion has the potential to de-water rivers, destroy aquatic habitat, and promote waste and sprawl in both the donor and receiving basins.

Lastly, we think the spirit of the proposal runs entirely contrary to the MWRA’s mission. The MWRA Enabling Act Chapter 372, Section 8(e) part (iv) says that the MWRA should “identify and consider demand management and water conservation solutions to new and existing water consumption requirements and, wherever reasonably practicable, to implement such solutions **in preference to solutions which would increase water withdrawals from any natural or artificial source of ground or surface waters.**” (emphasis ours) That is to say, interbasin transfer is supposed to be a last resort, with a prerequisite of achieving the highest levels of water use efficiency and water system management. Unfortunately, MWRA has opposed the water efficiency standard recently proposed by the MA EOE and is now considering increasing water withdrawals (from towns that have not necessarily met efficiency standards) in preference to other solutions.

It is our opinion that the proposal is inconsistent with the idea of “smart growth,” would lead to increased sprawl, and have negative effects for the Connecticut River watershed. It appears that some communities are interested in joining MWRA to satisfy growing needs from excessive lawn watering. Depriving more water from the donor basin’s rivers for *nonessential* uses doesn’t seem like a good way to manage a state’s natural resources. We hope that at the very least, the MWRA will perform a comprehensive analysis of the many environmental issues your proposal raises and give these issues full public airing. Short-term financial benefits are not a good idea if the long-term impacts have not been assessed.

Sincerely,



Chelsea Reiff Gwyther
Executive Director

cc: Governor Mitt Romney
MA state legislators
MA Executive Office of Environmental Affairs
New England Interstate Water Pollution Control Commission
Water Supply Citizens Advisory Committee