



**WATER SUPPLY CITIZENS
ADVISORY COMMITTEE**
to the Mass. Water Resources Authority

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To:

Massachusetts Water Resources Commission (WRC)
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
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From:

Water Supply Citizens Advisory Committee (WSCAC)
485 Ware Road
Belchertown, MA 01007
Email: info@wscac.org

Re: Public Comment

Project: Massachusetts Water Resources Authority (MWRA) Interbasin Transfer Act (ITA) Application

Proposal: 20 Million Gallons per Day (MGD) Rate Increase Request (Donor Basin Review)

Source Basins: Chicopee River Basin (Quabbin Reservoir) and Nashua River Basin (Wachusett Reservoir)

September 30, 2026

Thank you for the opportunity to comment on the Massachusetts Water Resources Authority (MWRA) request to increase its current interbasin transfer rate by 20 million gallons per day (MGD) to accommodate future expansion across multiple public water systems. The Water Supply Citizens Advisory Committee (WSCAC) commends MWRA for reducing system-wide water use from more than 330 MGD in the 1980s to approximately 200 MGD today (Figure 1). WSCAC neither supports nor opposes the 20 MGD donor basin review exemption because the request is legal under 313 CMR 4.10. However, WSCAC's neutral position on this request does not constitute support for allocating water beyond demonstrated need.

As WSCAC considers this future expansion, it recognizes that PFAS and other contaminants may increase demand for MWRA water and that admitting communities whose existing supplies become unsafe may be necessary. However, decisions about which communities to admit should be based on demonstrated need and on the importance of keeping rising MWRA water demand in check. These decisions should also account for more frequent droughts linked to climate change and the potential for substantial increases in water demand from AI data centers, which could further strain the water supply. WSCAC's position on the 20 MGD request assumes that future admissions will follow MWRA's Admission of New Community to MWRA Water System policy (OP.10), which requires applicants to continue using local water sources to the maximum feasible extent and to protect them under MEPA and MassDEP guidelines. WSCAC asks that these requirements be rigorously applied when considering future admissions to ensure that any approved increase is allocated efficiently. MWRA should also require strict water conservation measures in these receiving communities.

These potential increases in demand must be weighed against the water needed to sustain the environment and its valuable ecosystem services (Figures 2 and 3). WSCAC notes that current system use of approximately 200 MGD is below MWRA's registered amount of 312 MGD and the reservoirs' safe yield of 300 MGD, as shown in the MWRA presentation at the MWRA–WSCAC ITA meeting on August 25, 2026 (slide 11). Even with this margin, WSCAC asks the Commission to assess how the proposed additional transfer would affect downstream flows and ecosystem services. This assessment should also consider recent increases in water demand in the MWRA service area. According to MWRA's July 2026 Water Use Report, total year-to-date water supplied through July 2026 was 4.5% higher than in the same period in 2025. In addition to the potential demand arising from PFAS and other contaminants described above, population and housing growth could further increase demand for MWRA water. As demand grows, increasingly severe droughts related to climate change could place greater pressure on water in the environment than on water used by people.

To assess these effects, WSCAC asks MWRA to quantify the water needed to protect ecosystem services in the upper and lower Swift River basin and to meet other donor basin commitments, including hatchery withdrawals and the needs of all Quabbin towns. At the August 25 meeting, MWRA explained that the hatchery typically uses about 6.2 MGD, that this water returns to the Swift River, and that it is counted as a withdrawal for safe-yield accounting. The presentation lists an approved hatchery amount of 7 MGD, which differs from typical use (presentation, slide 7). The illustrative amounts of 30 MGD for downstream releases and 40 MGD for a combined environmental allowance are not established in these materials. MWRA should provide the applicable release requirements, explain how they vary with hydrologic conditions, quantify other donor basin commitments, and show how each is accounted for in its safe-yield and demand calculations. This accounting should avoid deducting the hatchery withdrawal or other commitments twice.

Along with quantifying donor basin commitments, WSCAC asks MWRA to calculate and retain a substantial, unallocated margin of safety to account for future hydrologic uncertainty. At the August 25 meeting, MWRA noted that climate change could shift the timing and pattern of water availability and that its planning does not assume a potential increase in reservoir yield (presentation, slide 10). WSCAC proposes a 10 MGD reserve for consideration. Based on the 300 MGD safe yield shown in the MWRA presentation (slide 11), the 260 MGD demand scenario leaves a difference of $300 - 260 = 40$ MGD. Deducting the proposed 10 MGD reserve from this difference would leave $40 - 10 = 30$ MGD. This is an illustrative WSCAC proposal, not a reserve established by MWRA's analysis. MWRA should explain the appropriate reserve in light of future climate uncertainty, donor basin needs, and system reliability. Maintaining local water systems as backups would provide additional protection.

Continued conservation is central to balancing future demand with the protection of downstream flows and ecosystem services. WSCAC's decision not to oppose donor basin approval of the proposed increase assumes that MWRA will continue to promote water conservation aggressively, thereby creating capacity to admit new members without significantly increasing system-wide demand above current levels. WSCAC believes that MWRA should encourage all its member communities to comply with the Massachusetts Water Conservation Standards fully. In particular, MWRA should consider offering subsidized loans to member communities to install fixed-network radio meter-reading systems that alert customers to possible leaks and provide data on their water-use efficiency. MWRA should also encourage member communities to adopt steeply ascending water rate structures that amplify the incentive to

conserve water, as well as rebate programs that incentivize the use of water-efficient plumbing fixtures, such as high-efficiency toilets and clothes washers.

Despite impressive improvements in water conservation since the 1980s, substantial potential remains to improve water use efficiency. In 2024, MassDEP statistics show median residential use at about 50 residential gallons per capita per day (RGPCD), while the most water-efficient communities averaged less than 30 RGPCD. Improving water use efficiency should go hand in hand with reducing carbon emissions to ensure a sustainable future.

With these demand pressures, environmental needs, and conservation opportunities in mind, WSCAC asks the Water Resources Commission to evaluate reasonable instream flows and the cumulative effects of the proposed additional 20 MGD, including under drought conditions, and consider the water conservation requirements discussed above during the review of the donor basin application.

Sincerely,

Moussa Siri, WSCAC Executive Director

Cc: Vandana M. Rao, Executive Director, Water Resources Commission
Steve Estes-Smargiassi, Interim Executive Director, MWRA
Kathy Baskin, Director of Planning & Sustainability, MWRA
Mathew Romero, MWRA Advisory Board Executive Director
Kristin MacDougall, Public Affairs /Assistant to the Board of Directors (MWRA)

Illustration Figures

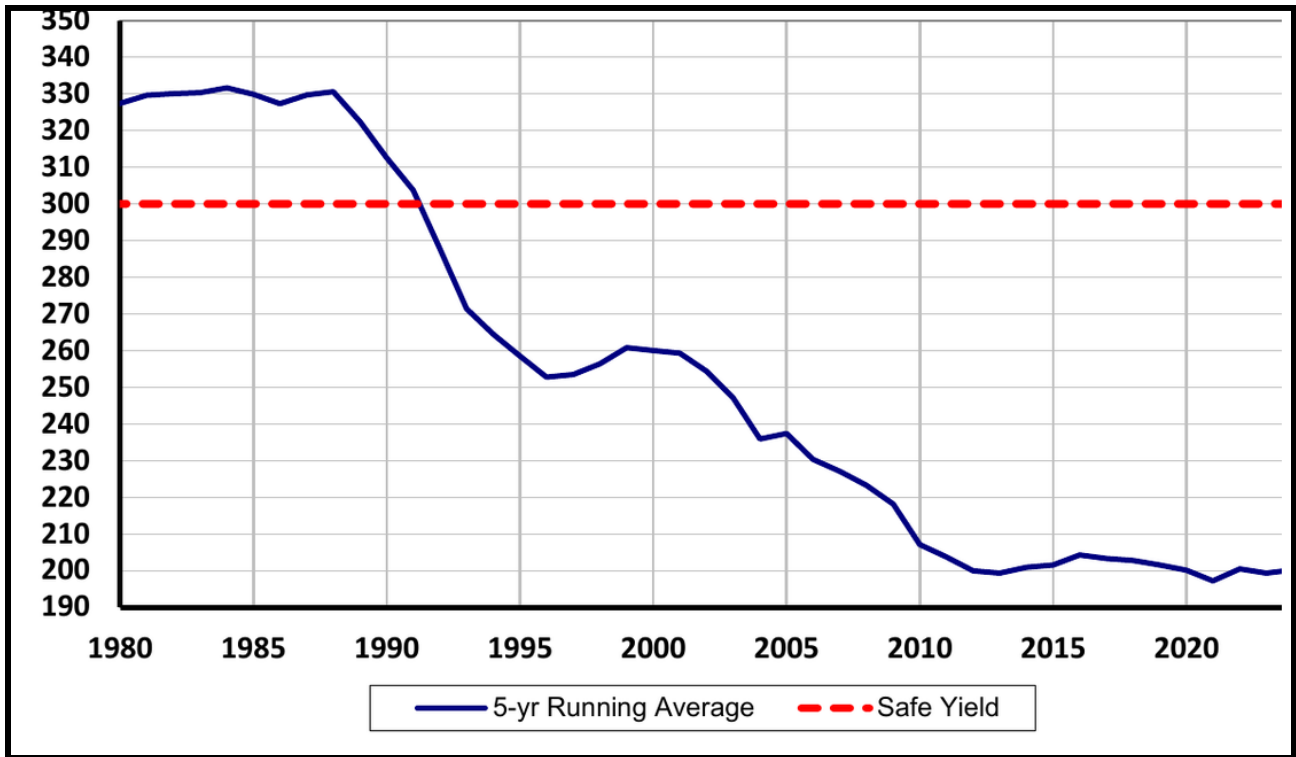


Figure 1. MWRA water demand and safe yield, 1980–2024. Chart provided with the comments.

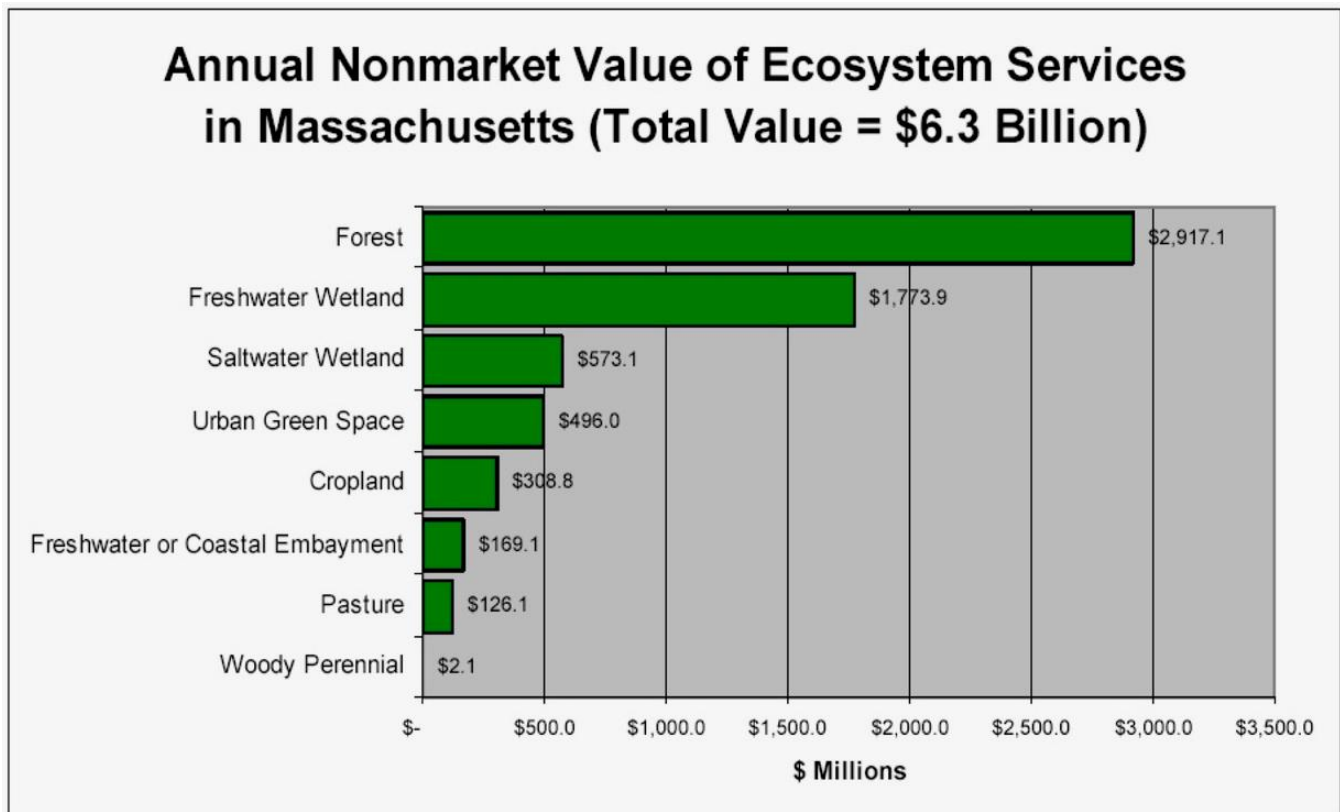


Figure 2. Estimated annual nonmarket value of ecosystem services in Massachusetts based on 1999 land cover data (Source: Losing Ground At What Cost? – Technical Notes, Mass Audubon by Gund Institute, University of Vermont).

Nonmarket Ecosystem Service Value Estimates by Land Cover Type

Land Use Type	Ecosystem Services Used in Valuation	# Data Sources	Mean Total \$acre/yr (2001 dollars)	Min value	Max value
Freshwater Wetland	Disturbance Prevention; Freshwater Regulation & Supply, Waste Assimilation, Aesthetic/Amenity, Soil Retention	13	\$15,452	\$7,684	\$31,772
Saltwater Wetland	Disturbance Prevention, Nutrient Regulation, Habitat, Recreation	10	\$12,580	\$9,991	\$24,457
Freshwater or Coastal Embayment	Freshwater Regulation and Supply, Habitat, Recreation, Aesthetic/Amenity	25	\$983	\$64	\$2,985
Forest	Climate and Atmosphere, Disturbance Prevention, Habitat Refugium, Recreation	8	\$984	\$407	\$1,998
Cropland	Aesthetic/Amenity, Soil Retention, Pollination	3	\$1,387	\$1,387	\$1,387
Pasture	Aesthetic/Amenity, Pollination	2	\$1,381	\$1,381	\$1,381
Woody Perennial	Pollination	1	\$49	\$49	\$49
Urban Green Space	Waste Assimilation, Recreation	3	\$3,430	\$2,692	\$4,167

Figure 3. Ecosystem service value estimates by land cover type and individual services used in the calculation (Source shown in figure: Losing Ground: At What Cost? Technical Notes).