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Subject: Draft 2026 Housing Production Plan — request for a directive on infrastructure capacity figures prior to state submission - Submitted for: August 19, 2026 joint Select Board and Planning Board meeting packet
Date: Tuesday, August 11, 2026 4:32:00 PM

Members of both Boards,

Nantucket Tipping Point submits this comment on the draft Housing Production Plan dated July 21, 2026. We are not asking the Boards to delay adoption. We are asking that adoption carry a directive to complete one required element of the plan before it goes to the state.

Why this protects the submission. 760 CMR 56.03(4)(b) requires that the needs assessment examine development constraints and the Town's plans to mitigate them, and — separately and explicitly — “the capacity of the municipality's infrastructure to accommodate the current population and anticipated future growth, including plans for enlargement or expansion of existing infrastructure systems to ensure that both current and future needs are met.” The draft states the principle at page 59, that housing growth is constrained by the island's infrastructure capacity, and then does not quantify that capacity anywhere in 92 pages. The word “gallon” does not appear in the document. A plan submitted in that condition is weaker than it needs to be, both in EOHLIC review and in any future proceeding where the adequacy of the Town's constraints analysis is at issue.

Suggested motion language:

Moved, that the Board adopt the 2026 Housing Production Plan, and further direct that prior to submission to the Executive Office of Housing and Livable Communities, staff supplement the Development Constraints chapter to include:

- (1) for the Surfside and Town wastewater treatment facilities — permitted capacity, current average and peak flows, flow committed to approved but unbuilt projects, and remaining headroom, in gallons per day;
- (2) for the Wannacomet and Siasconset systems — permitted or registered withdrawal volumes, current peak-day demand, the 2024 PFAS6 result by well and analyte with concentration, and the capacity and schedule of the mobile treatment facility referenced at page 60;
- (3) the capital costs already identified for the infrastructure improvements the plan contemplates, including those in the 2021 Sewer Master Plan, together with the funding mechanisms anticipated; and
- (4) identification of the board or department responsible for evaluating these systems in the aggregate against the buildout figures at pages 51–52.

The gap the directive would close. At pages 51–52 the draft reports the Weston & Sampson Buildout Study of August 2025: approximately 86 percent lot buildout but only approximately 38 percent dwelling unit buildout, with up to 1,524 new lots and up to 17,432 additional potential dwelling units on existing lots under current zoning. The plan appropriately calls this

a theoretical maximum rather than a prediction, and notes it excludes special permits, secondary and tertiary lots, Covenant lots, and Flex and Open Space Residential Developments. The study's non-buildable criteria are entirely land-based — open space, conservation and Land Trust parcels, publicly owned parcels, wetlands and buffers, FEMA flood zones, water bodies, sea-level rise. Infrastructure capacity is not among them, and the Development Constraints chapter does not supply it.

On wastewater, page 60 states that improvements to the Surfside facility are expected to grow considering capacity constraints — asserting that constraints exist without stating what they are. The Somerset Needs Area extension receives one sentence.

On water supply, page 55 states that the sole-source aquifer is fed entirely by groundwater recharge from precipitation and is vulnerable to saltwater intrusion, over-pumping, and contamination. Page 60 states that 2024 PFAS6 sampling at Wannacomet showed low levels of PFAS in one groundwater well, that the aquifer is highly vulnerable due to a lack of hydrogeologic barriers, that the facility serving the largest water district does not treat the water, and that a mobile treatment facility is being installed. No concentration, well identification, or installation schedule is given. The plan identifies over-pumping as a risk and states no withdrawal volume, permitted limit, or peak-day demand anywhere. The words “withdrawal” and “drought” do not appear in the document, though Nantucket County has been under a state drought designation throughout the period in which this plan was prepared, most recently addressed by the Drought Management Task Force on August 7, 2026.

On cost, Strategy 15 recommends expanding infrastructure to facilitate housing growth in 63 words. The plan states no capital cost and identifies no funding source for that expansion. The terms “capital improvement,” “betterment” and “ratepayer” do not appear in the document. A recommendation to expand infrastructure, without cost or funding, does not satisfy the regulation's requirement for plans for enlargement or expansion of existing systems.

One related request. The PFAS detection disclosed at page 60 does not appear in Wannacomet's 2025 Consumer Confidence Report, nor does the treatment installation. Siasconset's 2025 report, same department and same year, reports PFAS6 at 2.86 ppt against a 20-ppt state limit. Wannacomet's report separately discloses that a 2024 Notice of Non-Compliance “was not included in our 2024 Consumer Confidence Report as required.” Only the 2025 report is posted on the Town's Water Quality Reports page. We ask that the Boards request the Water Department restore at least five years of reports online.

This is not a request for a moratorium, and it does not oppose housing for the people who live and work here. It asks that a plan required to examine infrastructure capacity do so, using figures the Town already holds.

Respectfully submitted,

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