



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

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Vandana Rao, Executive Director
Massachusetts Water Resources Commission
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on the Proposed Changes to the Water Conservation Standards

Dear Ms. Rao,

WSCAC appreciates the opportunity to comment on the proposed updates to the Water Conservation Standards (WCS).

We offer the following observations and suggestions:

Introduction-

If the WCS is to truly serve its purpose as a vehicle to educate citizens on the importance of water conservation and water efficiency, there must first be a much larger, multi-layered, public education campaign. Such a campaign must begin at the local level. The WCS audience is agency-driven, and as such is not user friendly for purposes of public outreach and education. The document is written for, and primarily used by, agency staff at MassDEP, the Office of Water Resources, Massachusetts Environmental Protection Agency (MEPA) analysts, and Water Resources Commission (WRC) staff. Therefore, a link to the WCS on the WRC website will not increase public awareness regarding the vital importance of water conservation and water efficiency.

The starting point for public understanding of, and participation with water conservation and efficiency begins with messaging introduced by local officials. Templates for these types of programs are readily available and cost effective. MWRA's Demand Management program is one successful example. The program has shown that continuous public messaging, school programs, free water conservation kits and rates that cover the true cost of water result in reducing demand and increasing awareness of water as a valuable resource. Most if not all MWRA communities strive to be under 65 RGPCD and are actively working toward reducing UAW (now measured as real water loss, including leakage in transmission and distribution mains, storage leaks and overflows from water storage tanks, and service connection leaks up to the water meter). Utility companies like Eversource use a similar approach. The company distributes billing inserts and utilizes public messaging campaigns to explain and promote various ways to save money on your energy bill. In combination with rebates and free or reduced price products, these tools promote public awareness and lead to demand management.

In order to continue moving water conservation forward, state support and acknowledgement-- both in the form of regulations and a commitment to provide public awareness and incentives in the form of technical assistance grants to communities—is required.

Under the section titled “Intent and Purpose”, we urge the Commission to include the following passage addition to the current text, "Together, the standards and recommendations should guide all programs affecting the planning and management of the Commonwealth's water resources, including but not limited to: local and state land use and development planning, local and state low impact development planning, local and state hazard mitigation planning, local and state drought management plans, local climate change vulnerability assessment plans, local and state water conservation plans, the Water Management Act, the Interbasin Transfer Act, and the Massachusetts Environmental Policy Act (MEPA)."

Chapter 1-Comprehensive Water Resource Planning

WSCAC believes that all communities can benefit from the development of an Integrated Water Resources Management Plan. The 2016 drought highlighted the fact that most communities are not prepared to respond to local water resource issues. State technical assistance grants will serve as an incentive to communities and assist them in developing this plan.

Chapter 2-Water Loss Control

WSCAC appreciates the availability of MassDEP grants for community water audits. This is a useful tool for public water suppliers and town officials.

We encourage the Commission to continue listing the 10% UAW as a Standard. This is an important goal to aim toward. MassDEP already provides flexibility toward reaching this goal by using the language “as soon as practicable.” Moving Standard 2 to Recommendations would send the message that this goal is irrelevant. The truth is that while difficult, progress towards reducing unaccounted for water to the maximum extent practicable should continue to be a priority for financial, efficiency and conservation reasons. MWRA communities continue to actively pursue this standard and the Authority has been able to reduce its daily withdrawal from over 340MGD to less than 200MGD on average by reducing unaccounted for water through leak detection and pipe rehabilitation.

Chapter 4-Pricing

WSCAC appreciates the emphasis on setting rates that recover the full cost of providing water service. This approach is essential to meeting the goals of supplying high quality water. The establishment of an Enterprise Fund, keeping the basic fee affordable for all customers and setting ascending block rates to address seasonal and nonessential uses will assist public water suppliers in recovering costs necessary to providing the community with a reliable supply of clean, safe drinking water.

Setting rates is frequently a political issue within communities. Public buy-in for raising rates requires transparency and educational outreach so the public understands what they are paying for and why. Examples of this approach are readily available (MWRA and Framingham for instance) and document

the success of engaging the public with explanations of how their system works and their role in supporting it.

There is a reason for the expression “cheap as water.” Tap water typically costs less than a penny per gallon, whereas people often pay more than a dollar per gallon for bottled water. Water is typically the lowest utility bill in most households (except those who use a lot of water for non-essential uses or neglect to fix leaks).

In addition to setting rates high enough to cover the full cost of supplying the community with water, rates should be structured to minimize or eliminate fixed charges and rely instead on ascending block usage rates that provide an incentive to conserve vital and finite water resources. Usage rates should be higher in the summer to discourage non-essential outdoor water use when the natural environment tends to be most stressed. Usage rates should be set high enough to establish and maintain a fund to draw upon when rainy summers depress water revenues.

While public water systems are not identical, their primary goals are the same, and meeting these goals and the costs associated with them depend on charging the full cost for water service. In turn, the public’s acceptance of water rates depends upon a collaborative discussion at the local level.

WSCAC fully supports the recommendation that utilities include educational information to the public via bill inserts, website postings and local town messaging opportunities, and include the cost of public outreach as a necessary part of supplying the community with water. As noted earlier, these efforts are cost-effective and outreach materials are readily available from the Environmental Protection Agency (EPA), Alliance for Water Efficiency, local watershed groups, and utilities such as MWRA.

There is no justifiable reason for communities to neglect public outreach. The cost, staff time and materials are minimal. The benefits of public buy-in are significant. This has been proven time and again in communities around the state.

Chapter 5-Residential Water Use

WSCAC suggests that the information in 5.2 Recommendations beginning with choosing high-efficiency plumbing products and appliances should be Standards. These products are time-tested and make a significant difference in residential water use. Educating and encouraging the public through a rebate system provides an incentive and sends the signal that conserving water in the home is a central goal. High-efficiency plumbing products should be required in all new construction. Raising the bar on water conservation requires going beyond encouragement to actual implementation. The state must take a leadership role in order for this to happen. State and local plumbing codes may already be addressing this issue.

Chapter 6 and 7-Public Sector and Industrial, Commercial and Institutional

The University of Massachusetts at Amherst requires all new buildings to be LEED certified. They continue to retrofit older buildings and primarily implement xeriscaping to reduce or eliminate outdoor water use. With the cost-effective technology available for smart irrigation practices, there is no justifiable reason for outdoor water waste in the commercial, industrial and institutional sectors. We

encourage the state to require all new construction, particularly new school buildings and municipal building construction to meet the most stringent water conservation standards both indoors and outdoors. To lead by example provides a strong and necessary message.

We appreciate the information in the Standards 7.1 and suggest that the EEA Office of Technical Assistance promote their services in an accessible way so that industry groups and suppliers are aware that this assistance exists.

Chapter 8-Agricultural Water Use

WSCAC appreciates the information in 8.2 and the resources listed in 8.3. We encourage the Dept. of Agriculture to provide educational material to growers on the benefits of micro-irrigation (drip irrigation techniques) and additional grants to growers for the purpose of purchasing micro-irrigation systems. The 2016 drought signaled that access to irrigation options that provide improved watering techniques with reduced waste are needed. With the introduction of Cannabis growing in Massachusetts, which requires high levels of water and energy usage, the state should have standards ready to address the effects of this new crop. Encouraging the Department of Agriculture to provide education on proper crop selection given the climate of Massachusetts would be helpful..

Chapter 9-Outdoor Water Use

WSCAC supports 9.4 and appreciates the focus on “Adopt and implement a water-use restriction bylaw, ordinance or regulation.” We know from the recent drought that restricting nonessential outdoor water use is an important tool for protecting public health and the environment. With the state as a leader requiring that communities have an integrated water/drought management plan and providing the technical assistance funds needed to produce this plan, municipalities can craft an ordinance that meets the needs of the community. Given that this can be a political issue, community outreach is vital and all town officials must stand united on the messaging needed to promote public buy-in.

We are looking to the state to lead by example. By requiring statewide watering restrictions during a state-declared drought, and providing the technical assistance that communities need to comply, the common goal of reducing water use to protect public health and the environment across the state is possible.

Given that MassDEP has not yet promulgated regulations or specified the criteria for system interruption devices, should the footnote on page 40 about MGL.ch21 sec. 67 be included?

Chapter 10-Public Education and Outreach

WSCAC believes that Public Education and Outreach is where the conversation must begin. As previously mentioned, public outreach is vital if we are to move forward with water conservation, and encouragement alone will not raise the bar. Challenges and obstacles are always present but the willingness to meet them and move forward is necessary if we are to protect our water resources into the future. A financial commitment with appropriate requirements at the state level to support

communities in their process to become more resourceful and resilient is the first step. Municipal officials must commit to work together with the public toward a mutual understanding of the challenges we face to protect our water resources. California, Arizona, New Mexico and Texas have excellent examples of statewide public education and outreach regarding water conservation.

We appreciate the work of DCR and EEA staff as well as the many other groups and individuals who provided resources and information for this document. Our hope is that the material is made available to every city and town in the state so that community officials can use the standards and recommendations as a starting point in the conservation discussion.

If WSCAC can be of assistance in this public outreach effort, please let us know.

Sincerely,



Executive Director, WSCAC