



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

485 Ware Road
Belchertown MA 01007
(413) 213-0454
fax: (413) 213-0537
email: info@wscac.org

July 26, 2021

Elizabeth McCann, Water Management Act Program
MassDEP
One Winter Street, 5th Floor
Boston, MA 02108

RE: Proposed Amendments to 310 CMR 36.00-Conditions on WMA Registrations

Dear Ms. McCann,

The Water Supply Citizens Advisory Committee (WSCAC) to the Massachusetts Water Resources Authority (MWRA) is providing comments on MassDEP's proposed amendment to 310 CMR 36.00, the Water Management Act regulations to include a new condition on registrations that would restrict nonessential outdoor water use by registrants during a drought declared by the Secretary of EOEEA.

WSCAC has a seat on the Drought Management Task Force and has provided comments on the updating of the MA Drought Management Plan after the 2016 drought. We support MassDEP's proposed amendment to registrations for the following reasons:

- Aligning WMA registrations to respond to a declared drought as specified in the MA Drought Management Plan will produce a more unified drought response. WMA permits already restrict nonessential outdoor water use from May-October.
- During a declared drought, nonessential outdoor water use should be reduced in order to ensure an adequate supply of water for public health, safety, and protection of natural resources. MassDEP's proposed amendment allows for essential uses to continue including agricultural and required uses by statute.
- Massachusetts experienced two significant droughts in 2016 and 2020. The lack of a unified response in 2016 occurred throughout the state. This caused delayed and inadequate public messaging, a lack of drought preparedness at the municipal level and insufficient collaboration between state agencies. There were impacts to public drinking water sources, natural resources, agriculture production and wildfire risk. The updating of the MA Drought Management Plan in 2019, in collaboration with the Drought Management Task Force, is a response to lessons learned after the 2016 drought. We saw improved communication from the state with the flash drought in 2020, yet a lack of unification remains at the municipal level.
- With flash droughts becoming more frequent, conserving water for essential needs during a declared drought is a reasonable and attainable goal for all communities. We know from previous experience that without a unified and timely response, water supply emergency

declarations, crop damage, heightened wildfire risk and low/no flow conditions in rivers and streams can affect towns throughout the state.

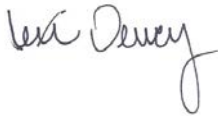
While each public water system may have unique characteristics, and larger systems may have a more flexible margin, regulating outdoor nonessential water use during a state declared drought is a significant and achievable way to ensure there is adequate water for critical uses.

During the 2016 drought, MWRA water sales were up 38% for nine partially supplied MWRA water communities. Four additional communities made inquiries about possible emergency connections if the drought continued. As a regional wholesale water supplier with a MassDEP registration of 300 mgd and an approved drought plan, the MWRA would not be included in the new proposed amendment. While MWRA encouraged wise water use during the droughts of 2016 and 2020, fully supplied water customers were not restricted from outdoor water use as reservoir levels were within the Normal range.

In summary, WSCAC appreciates and supports this first step toward coordinating water use in times of drought so that residents and natural resources in the present and future will have an adequate water supply.

Thank you for the opportunity to comment on the proposed amendments to 310 CMR 36.00.

Sincerely,

A handwritten signature in cursive script that reads "Lexi Dewey".

Lexi Dewey
Executive Director
WSCAC