

NEPONSET RIVER WATERSHED ASSOCIATION

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Vandana Rao - vandana.rao@state.ma.us
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Massachusetts Executive Office of Environmental Affairs

Dear Ms. Rao and Ms. Monnelly:

Thank you for your outstanding work in preparing the draft update of the Water Conservation Standards of Massachusetts. We anticipate that these standards will have a major influence on whether or not Massachusetts makes real progress toward reducing wasteful water use practices and restoring flow in our beleaguered rivers, streams and wetlands over the next decade or more that the standards are likely to remain in force.

Here are our comments:

- The Standards should establish summertime rgpcd targets. Summertime is by far the most critical time of year for water supplies and for the environment.
- The Standards should recommend the implementation of automatic meter reading and leak mapping technology in communities in stressed basins that fail to meet the 65 rgpcd standard or the 10% unaccounted-for water standard.
- The Standards should recommend that water meters be installed on all automatic irrigation systems and that much higher prices be charged for water used for this non-essential, cosmetic use of water. They should also recommend that municipal outdoor water use restrictions instituted during droughts and times of low streamflow apply equally to public as well as private water supplies. In most cases the water comes from the same aquifer, and as a practical matter the restrictions are only enforceable if applied to everyone.
- When the Standards say a particular measure "should" be taken, it should also explicitly state that EOEA agencies "shall" begin to take action to implement that measure insofar as they have the statutory authority to do so.
- It is not enough for the Standards to say that water suppliers should use full cost pricing which accounts for, among other things, the environmental costs of water withdrawals. EOEA should commit to developing a methodology for assessing the environmental costs of water withdrawals for water suppliers to use in setting "full cost" water prices.

Unless the Standards set the bar high enough, summer streamflows will continue to drop, as they have in the Neponset over the last twenty years, with grave environmental consequences.

Thank you for your consideration.

Steve Pearlman, Water Resources Analyst

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