



# INTERBASIN TRANSFER ACT (ITA) PERFORMANCE STANDARDS UPDATE 2024

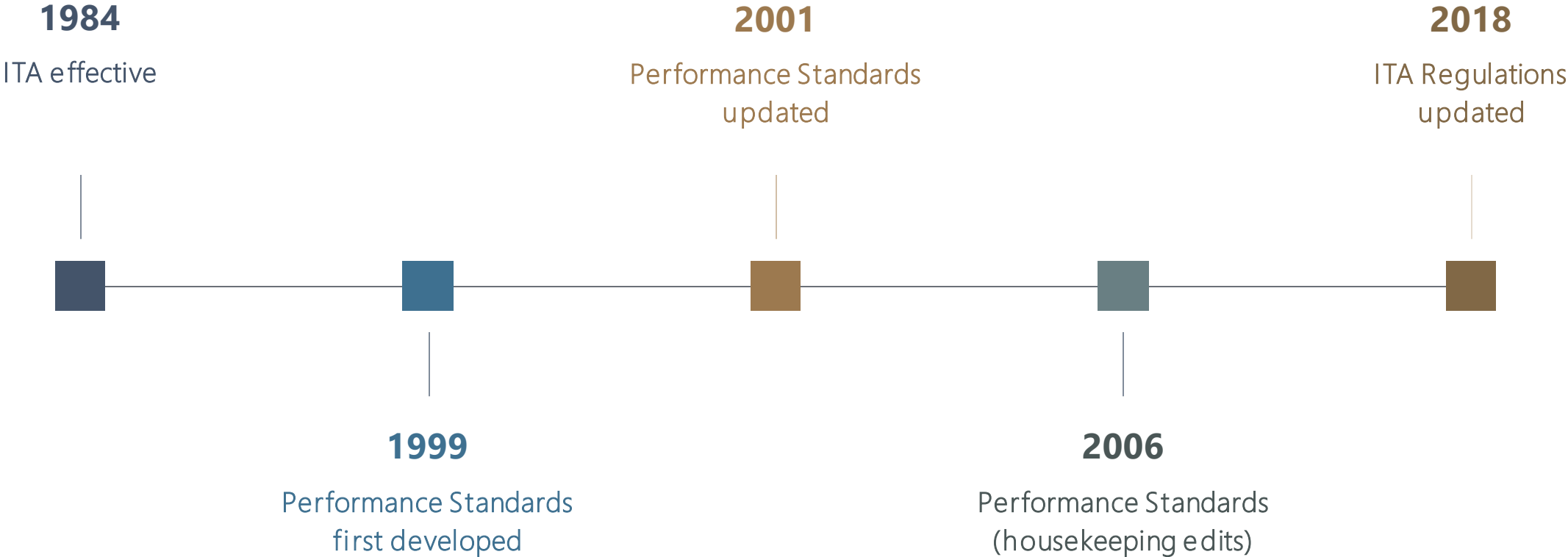
June 13, 2024

# AGENDA

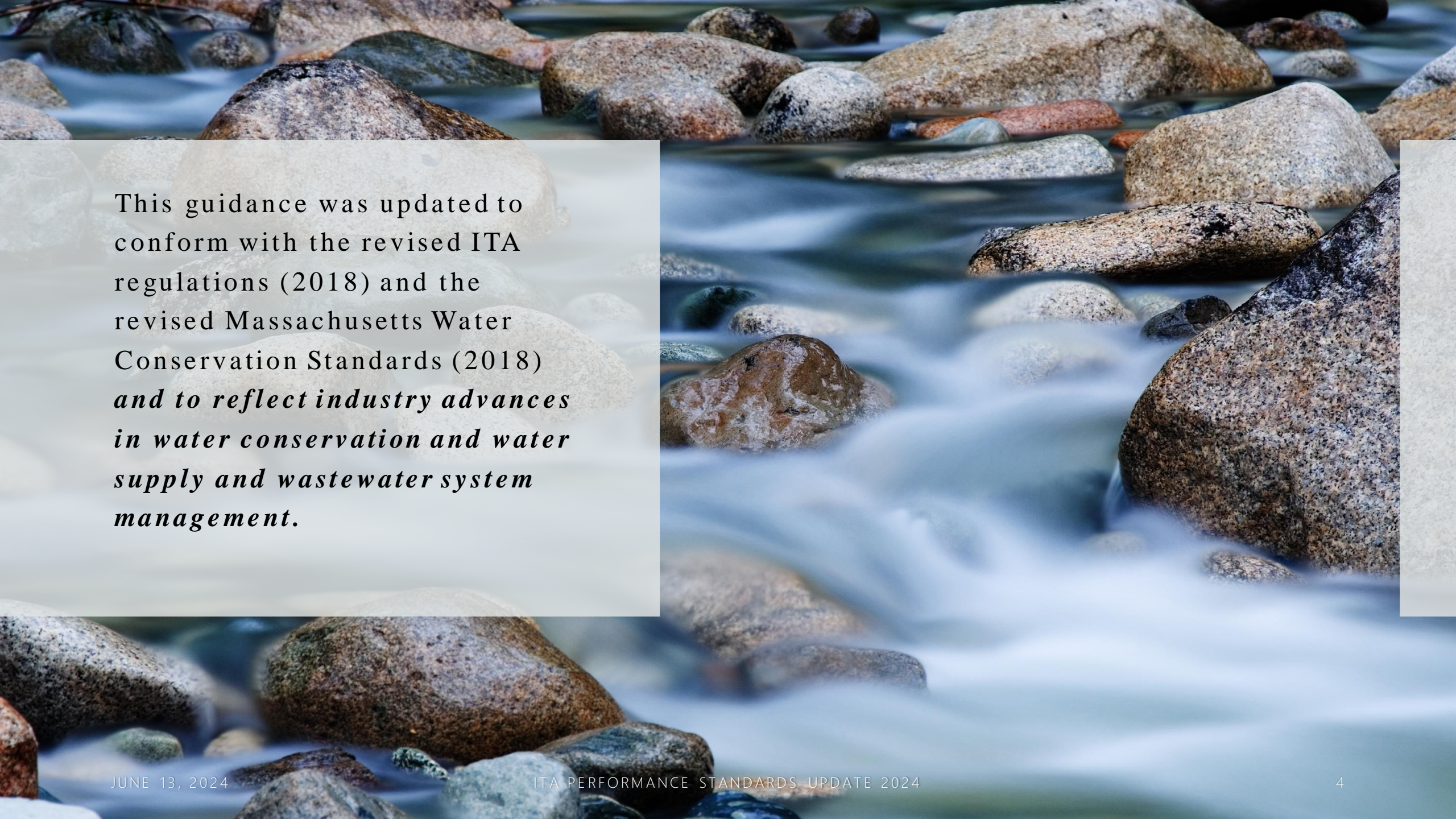
- Timeline
- Introduction
- Performance Standards Update
- Questions and Discussion



# TIMELINE







This guidance was updated to conform with the revised ITA regulations (2018) and the revised Massachusetts Water Conservation Standards (2018) *and to reflect industry advances in water conservation and water supply and wastewater system management.*





# INTRODUCTION

- BACKGROUND
- PURPOSE
- APPLICABILITY
- ORGANIZATION
- APPLICATION PROCESS
- REVIEW CONSIDERATIONS
- GUIDE TO ITA CRITERIA AND APPLICABLE PERFORMANCE STANDARDS BASED ON TYPE OF INTERBASIN TRANSFER

# CRITERIA FROM ITA REGULATIONS

Criterion #1 – Compliance with MEPA

Criterion #2 – Develop all viable sources in the Receiving Area

Criterion #3 – Must have implemented all practical water conservation measures

Criterion #4 – Implementation of a Forestry Management Program

Criterion #5 – Maintain reasonable instream flow

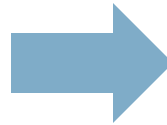
Criterion #6 – Impacts of groundwater withdrawals

Criterion #7 – Cumulative impacts

# CRITERION #1 Compliance with MEPA

2001 PS

MEPA review completed, if required



2024 PS

MEPA review now also requires certain projects located near environmental justice (EJ) populations to take steps to enhance public involvement opportunities for EJ populations and submit analysis of impacts to such EJ populations in an Environmental Impact Report (EIR)

## CRITERION #2

# Develop all viable sources in the Receiving Area

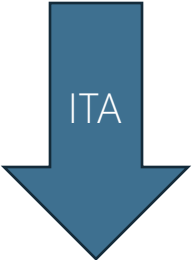
- Still three reasons for consideration of viability; however, the following changes were made:
  1. **Environmental:** added a paragraph detailing the types of impacts and considering their mitigation before concluding a source is not viable
  2. **Technological:** added a paragraph detailing types of technical issues that may arise and that may lead to economic infeasibility
  3. **Economic:** still two parts – costs & rates – but more detail added, including consideration of affordability by examining the burden of cost increases on low-income households (i.e., households with incomes below the 20<sup>th</sup> percentile of all households)



# CRITERION #2

## Develop all viable sources in the Receiving Area

*Viabile Source means a water source or wastewater service alternative that meets the current regulatory requirements of the permitting authorities, and is environmentally sound, technologically feasible and cost-effective.*



Wastewater sewerage out of basin

- Least \$ increase for 20<sup>th</sup> percentile household income



Local WWTP with surface discharge

- Nitrogen TMDL & endangered species



Wastewater sewerage with local groundwater discharge

- 25 sites evaluated and not feasible/permittable



Enhanced septic systems

- Significant increase for 20<sup>th</sup> percentile household income



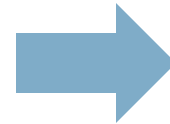
## CRITERION #3

Implement all practical water conservation measures

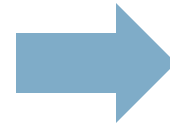
### General water conservation section changes

2001 PS

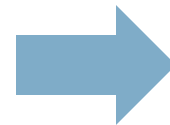
Broad descriptions of water conservation program expectations in list form



Water conservation plan vs. program expectations lacking clarity



No clear separation of indoor and outdoor water use



2024 PS

Water conservation section split into multiple sub-sections based on category

Outlines expectations for general water conservation programming and water conservation plan documentation separately

Indoor and outdoor water use expectations described in more detail in separate sections

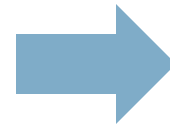
## CRITERION #3

Implement all practical water conservation measures

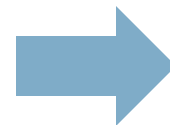
### General water conservation section changes (cont.)

2001 PS

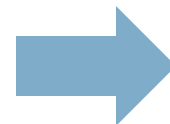
Only brief mentioning of data analysis



No clear separation between residential and non-residential water conservation



Guidance on protection of existing sources in receiving area located in multiple sections



2024 PS

New sub-section with guidance on how to inform water conservation programs with data analysis

Residential and non-residential described in more detail in separate sections

Reorganized to list the majority of source protection information in one sub-section



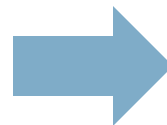
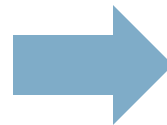
## CRITERION #3

# Implement all practical water conservation measures Water Loss Control Programs

2001 PS

Guidance on water loss control was limited to two items: leak detection and unaccounted-for water (UAW)

Not entirely in line with 2018 Water Conservation standards, MassDEP practices, and industry best practices



2024 PS

Water loss control guidance expanded into a new section

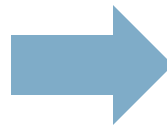
Edited to describe expectations for water loss control programs in more detail, including water system audits, data validity scores, audit validation, and updated leak detection frequency

## CRITERION #3

# Implement all practical water conservation measures Metering

2001 PS

Guidance on metering was limited to two simplified items



2024 PS

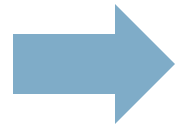
Metering guidance expanded to include more detailed information based on 2018 WC standards

## CRITERION #3

# Implement all practical water conservation measures Inflow/Infiltration Control Program

2001 PS

Guidance on I/I was partially outdated due to more recent changes to MassDEP regulations and guidance



2024 PS

Expanded I/I section and aligned with MassDEP regulations (2014) and MassDEP guidance (2017)



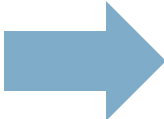
# CRITERION #3

## Implement all practical water conservation measures Water Rates and Billing

Presented update to WRC in February and March 2021

### 2001 PS

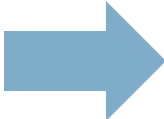
Require full-cost *recovery*



### 2024 PS

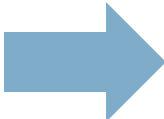
Require full-cost recovery; expectation of full-cost *pricing* or timeline to transition to full-cost pricing  
**\* *This is a directive of the ITA***

No description of planning horizon



Expectation of 10-year or longer planning horizon  
**\* *This helps define full-cost recovery***

Recommend enterprise fund



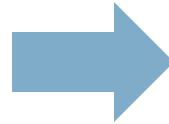
Expectation of enterprise fund (or equivalent)  
**\* *This is an industry standard***

## CRITERION #3

# Implement all practical water conservation measures Water Rates and Billing (cont.)

2001 PS

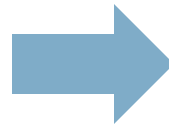
Require conservation price signal



Require conservation price signal (clearer benchmarks; presented to the WRC in March 2021)

***\* This is a directive of the ITA***

Require quarterly or more frequent billing



Require quarterly or more frequent billing; expectation of monthly billing or timeframe to transition to monthly billing

***\* This is an industry standard***

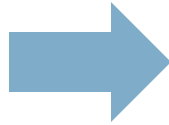
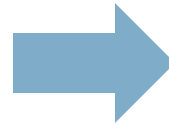
# CRITERION #4

## Implementation of Forestry Management Plan

2001 PS

required approval of plan by DCR or other appropriate agency

identifies timber harvesting carried out per 304 CMR 11.00 (Forest Practices regulations)



2024 PS

specifies approval by DCR Service Forestry Program only

identifies updated regulations 302 CMR 16 (Forest Cutting Practices) **and** requires consistency with any other state policies on harvesting



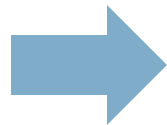
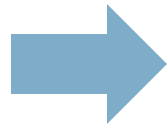
# CRITERION #5

## Maintain reasonable instream flow

2001 PS

Described the submittal materials

No guidance specific to wastewater transfers in the Criterion 5 section; Criterion 5 I/I language found in Criterion 3 section



2024 PS

Identifies specific resources/resource values that will be evaluated to determine if there will be adverse impacts from the transfer

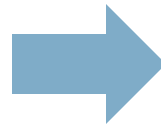
Added section applicable to wastewater transfers; moved and modified I/I language related to Criterion 5 from Criterion 3 section to Criterion 5 section

# CRITERION #6

## Impacts of groundwater withdrawals

2001 PS

Described the submittal materials



2024 PS

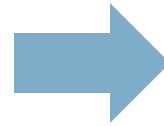
Describes the evaluation metrics:

- Static water levels
- Cone of depression
- Adverse impact to adjacent wells, lakes and pond levels

# CRITERION #7 Cumulative impacts

2001 PS

Mentioned only streamflow impacts



2024 PS

Clarifies all hydrologic impacts that are considered



# QUESTIONS AND DISCUSSION

JUNE 13, 2024

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