

Comments Received on the Massachusetts Drought Management Plan (January 2019 Draft)

Comment Letters/Emails Received from these organizations and individuals:

1. Boutt, David, UMass Amherst
2. Conservation Law Foundation
3. Charles River Watershed Association
4. Charles River Conservancy
5. Charlestown Waterfront Coalition
6. Connecticut River Conservancy
7. Carolyn Dykema, Representative
8. Green Industry Alliance
9. Ipswich River Watershed Association
10. Jones River Watershed Association
11. Mass Audubon
12. Massachusetts Rivers Alliance
13. Massachusetts Water Resources Authority
14. Massachusetts Water Works Association
15. Massachusetts Sierra Club
16. Narragansett Bay Riverkeeper, Save the Bay
17. Nashua River Watershed Association
18. Neponset River Watershed Association
19. North South Rivers Watershed Association
20. OARS for the Assabet Sudbury and Concord Rivers
21. Ocean River Institute
22. Vincent Ragucci, Commissioner MA Water Resources Commission
23. SuAsCo Wild and Scenic River Stewardship Council
24. The Nature Conservancy
25. Water Supply Citizens Advisory Committee
26. Kenneth Weismantel, Commissioner MA Water Resources Commission

Summary of Comments

Overall General

- Broad support for revisions
- Overall, the plan is vastly improved.
- In response to comments, include analysis of performance of updated DMP based on 2016 drought.
- Sufficient and timely drought response throughout the state requires public understanding and buy-in. Partnerships and workshops with and grants to local and regional groups will be vital.
- An on line Drought Impact Reporter will be very helpful and we support the state's efforts to obtain funding to establish this. Also urge state agencies to strengthen their own assessment of impacts and reporting.
- Inconsistencies noted between items in the DMP (Table 9, Sec. 8, and App. H) and existing law (on system interruption devices, MGL Ch. 21, Sec. 67) and Water Conservation Standards. Request several modifications to DEP model bylaw.

Section 1: Introduction

- Support the inclusion of *Section 1.3.1. Massachusetts' Climate – Past, Present and Future (page 7)*. This section provides detailed descriptions of the new climatic norms climate scientists anticipate that we will see in our region with a particular emphasis on the likely increasing occurrence of droughts. We appreciate the inclusion of this information as it points to the acute importance of drought preparedness and response in the state.
- General support for highlighting the effects climate change is having on precipitation patterns...more intense bursts do not provide same degree of groundwater recharge.
- Hope that information on Mass. Climate will be updated over time to include evolving climate change reports prepared at the state level and shared at the local level.
- Impervious surfaces further exacerbate climate-related stresses. Acknowledge linkages between land use and water management in the Introduction, along with climate change.
- 1.2, para. 1 – Include communication with habitat restoration projects and programs, i.e., non-profit watershed and land conservation groups; Regional Planning Agencies; MMA
- 1.3.1, para. 2, precipitation patterns: "Where this is generally true, it is focused on averages, rather than seasonal swings that could bring challenging conditions like those in 2016-18... Clarify."
- 1.3.2, Drought Impacts – should include/mention that repetitive droughts can weaken and stress forests and lead to substantial damage from storms as in the late winter of 2018 (March) when vast numbers of trees were uprooted and felled across the southeast coast.
- 1.3.3: Correct reference to Appendix J; should be I.
- 1.3.3, History – Emergency laws that were enacted in 1964 to address the drought have become "grandfathered" virtually assuring that repetitive conditions will result. (i.e. Law expanding Brockton's water supply was intended to lead to greater improvements in water supply for the City, but political conflicts and resistance have prevented improvement.

Section 2: Authority and Coordination

- Propose that in *Section 2.2.1 Composition (page 10)*, that the composition of the Drought Management Task Force is modified to include:
 - a representative from the watershed non-profit community. The current make-up of the task force does not currently include any representatives who can speak with authority on the conditions of particular streams and rivers. Though the Division of Ecological Restoration and Division of Fisheries and Wildlife may share updates about some river conditions, they often lack

the time and resources to monitor and report on all regions in the state. The watershed community is well positioned to fill this role as it is well connected and individuals from this community have local expertise that they can share with the rest of the Task Force to ground statewide assessments.

- a hydrologist from one of the major Massachusetts universities or colleges. An additional hydrological expert with connections to resources outside of USGS would provide a potentially informative perspective to add to the Task Force.
- In response to comments at the February 14th WRC meeting that there needs to be more representation by the environmental community on the DMTF, WSCAC serves this role. Watershed groups should do a better job coordinating their comments with WSCAC.
- Watershed organizations with critical information to share from the basin level will strengthen the recommendations provided by the Task Force.
- 2.2.1, Composition – EEA should contact the MA Health Officers Association to determine interest in joining the Drought Management Task Force. Currently, only the MA Association of Health Boards is listed as a member.
- Propose that in *Table 1. Responsibilities of State and Federal Agencies (page 12)*, under “MassDEP,” the following change:
 - “Provide list of all communities with mandatory and voluntary watering restrictions and declared water emergencies”
- 2.4, Table 1 – No agency appears to evaluate stress on environmental assets other than water supply and man-made infrastructure. No agency steps in to call for water ban?
- 2.4, Table 1, DEP resp. to declare water emergencies: Does not cover the harm done to Silver Lake and Jones River from unnecessary water takings during drought.
- Sec. 2 should note that MWRA can initiate its Drought plan for its water service communities.
- Drought Management Mission Group seems redundant; weakens transparency and information sharing. Add experts to DMTF instead.
- Drought Management Mission Group: adds an unnecessary layer. Drought assessment should remain the purview of the DMTF, a body with open meetings that reports publicly.
- In Table I, Responsibilities of State and Federal Agencies, we recommend further clarification on the responsibilities and requirements of the Department of Public Health and the Department of Public Utilities regarding drought preparedness and response actions....strengthen direct outreach to local authorities.
- Final Plan should clarify that EEA has the authority to declare a drought when the indices warrant it, even if it is not able to convene the task force.

Section 3: Drought Assessment and Determination

- 3.1 Drought Levels- Agree with the new nomenclature
- Propose that in *Section 3.1 Drought Levels (page 13)*, that “Level 1-Mild Drought” is changed to “Moderate Drought.” “Moderate” conveys a stronger sense of severity than “mild.” While we acknowledge that the U.S. Drought Monitor uses similar nomenclature for one of their drought levels, we feel strongly that the use of the term “mild” may lead some to think that the current drought conditions should not be taken seriously.
- 3.1 Drought Levels – renaming “Advisory” level as “Mild Drought” is an improvement that will facilitate clearer communication with the public.
- 3.2 Drought Regions – Question the rationale of moving Brookline from Southeast to Northeast.
- 3.2 Drought Regions – Concern with statement “During a Drought, these regions may be adjusted based on the particular conditions of the drought. For example, drought analyses may be performed and declarations made on an individual county or watershed basis”. Question whether there is enough data and concerned about communication challenges.

- 3.2 Drought Regions – Martha’s Vineyard and Nantucket should be independent regions.
- 3.2 Drought Regions – Urge EEA to look at whether there are more appropriate indicators for Cape/Islands and parts of Plymouth-Carver due to unique hydrologic characteristics.
- 3.2 Drought Regions – The described levels and method assumes parity across regions rather than consideration of out of basin transfers that can radically exacerbate drought conditions in our region.
- Drought Regions: make it clear that the DMTF will also examine and consider drought levels at the watershed hydrological scale. Several watersheds span more than one county or drought region.
- 3.2 Drought Regions – MWRA has its own Drought plan separate from the statewide plan. Drought levels and water use restrictions within MWRA service area may be different from levels and restrictions that apply to non-MWRA communities.
- 3.2, Table 2: include a footnote identifying the number of MWRA communities in each Drought Region.
- 3.3, Table 3 – Need more guidance and information to help the next generation forest evolve.
- 3.4 Maps – Every map should include an overlay of MWRA communities with clear notation that MWRA drought plan applies.
- 3.4 – 4.3 Drought Determination Methodology – acknowledges important role of professional judgement and collaboration by Task Force members. Requests more robust explanation of information considered by Task Force.
- 3.4.1 Methods for Calculating Indices – Monthly Hydrologic Conditions should show if metrics of an index are much above normal.
- 3.4.1 Methods for Calculating Indices – Concerned by the statement, “Index severity for a region may be adjusted from the calculations based on best professional judgement”. Plan must be based on science and fact, not anecdote. Suggest strike this sentence.
- 3.4.2 Precipitation Gage Network – MWRA has a network of rain gauges that could be incorporated into the Precipitation Monitoring Network.
- 3.4.2 Precipitation Gage Network – Your entire period of record for the USGS Jones River gage is skewed by man-made chronic annual drought impacting our natural resources.
- Propose that in *Section 3.4.3 Streamflow (page 20)* “Figure 4: Massachusetts Stream Gage Network for Drought Monitoring,” that Drought Management Task Force staff reviews the current composition of the network gages. It appears that there are no gages in the Cape Cod and Islands Regions. If there are no options for gages in these areas, additional information should be provided in this section regarding how the Task Force will make assessments without any reporting data on this metric from these two regions.
- 3.4.4 Groundwater – Once completed, the ongoing network analysis should be included as an appendix in the DMP. Very important that wells be maintained and validated to ensure they are representative of natural conditions. Suggest plan include narrative on how validation will be done.
- 3.4.5 Lakes and Impoundments – Suggest expanding the network to include more data points- DCR should look at their own waterbodies. Surface water bodies with releases or artificial controls should not be included. Concur with John Gregoire comment to include an inventory of surface water body characteristics as an appendix to the DMP.
- Propose that in *Section 3.4.5 Lakes and Impoundments (page 23)* “Figure 6: Massachusetts Lake and Impoundment Monitoring Network for Drought Monitoring,” the inclusion of additional data points for the network. The current listing includes primarily water supplies, with only a handful of lakes or impoundments. In addition, the number of data points is extremely limited in many of the regions. For example, both the Connecticut River Region and the Southeast Region have only two data points. Additional lakes and ponds should be considered for inclusion in the network to ensure that reporting on this metric is truly reflective of conditions in the region.
- 3.4.5 Lakes and Impoundments – supports revision to this drought index.

- 3.4.5 Lakes and Impoundments – add sentence at end of first paragraph: “Alternatively, some reservoir systems may show drought impacts earlier given the shallow nature of their impoundments.”
- Fig. 6, Lakes & Impoundments – Figure does not include Silver Lake in Kingston, Pembroke, Halifax, Plympton, headwater of Jones River and Brockton’s primary water supply. Nor does it include the seasonally contributing Monponsett Pond in Halifax or Furnace Pond in Pembroke, or Brockton’s “Avon Reservoir”. Nor does it include many of the other lakes and ponds of the region that could be used as reference ponds for drought calculation. WHY?
- 3.4.7 Evapotranspiration – Should eliminate CMI until a better indicator can be identified.

Section 4: Process of Determining Drought Status

- 4.1 DMTF Deliberation and Drought Recommendations- Current plan and practice used majority of indices in a region to trigger declaration. New plan seems to move away from this. Concern this will lead to more subjectivity. Could weigh indices by season to be clearer what triggers will be for declarations.
- Stream flow indicators should be weighed more heavily in drought declaration decision-making.
- 4.3 End of Drought – current plan states “in order to return to normal status, groundwater levels must be in the normal range and/or one of two precipitation measures must be met. The precipitation measures are: 1) three months of precipitation that is cumulatively above normal, and 2) long-term cumulative precipitation above normal.” New drought plan should also make reference to these metrics for coming out of a drought.
- Propose in *Section 4.3 End of Drought (page 29)*, the following change:
 - “Determinations regarding the end of a drought focus on the precipitation and groundwater indices. These metrics will be prioritized when evaluating declarations for the end of a drought.”

Section 5: Drought Communication

- Support the inclusion of *Section 5: Drought Communication (page 29)*. This additional information clarifies the communication responsibilities of all relevant state agencies and establishes a strong framework for engaging regularly with the public about water conditions.
- Propose in *Section 5.1 Communication Platforms (page 30)*, the addition:
 - “The following direct forms of communication will also be utilized, as appropriate... Outreach to regional planning agencies”
- 5.2, Table 8 – EEA should also communicate with MMA, Regional Planning Agencies, Plymouth County (other) Commissioners, Central Plymouth County Water District, Watershed Associations and Conservation non-profits as these groups have additional capacity to inform members.
- Outside of the MWRA service area, drought awareness and preparedness in communities is limited. Using existing networks created by the Regional Planning Agencies will help ensure that drought communication can be managed at the local level.
- Local Communication: All residential, commercial and industrial water users must be informed with targeted and consistent messaging that explains the community’s approach and rationale.
- Support the addition of direct forms of communication as well as email. Many small towns with volunteer boards require more than web page access to receive accurate and timely information.
- Recommend that all communities receive the monthly hydrologic report... needs designated official to distribute this to town administrator, fire chief, public health officer, and local media. Emailing would cost little and can raise awareness at an early stage of a potentially serious drought. At a minimum, implement in areas where municipal or private well pumping is impacting local groundwater resources.

- Include Regional Planning Agencies in outreach efforts. RPAs have established communication links with towns.
- 5.3 – Press releases should state that TV news and Radio stations will be included.
- Engage radio and TV meteorologists as partners in communicating conditions to the public and interpreting what they mean; they are very active on social media as well. Provide basic training. Share Hydro Conditions report. Develop materials for specific conditions.

Section 6: Summary of Responsibilities by State Agency

- Recommend that the state make a commitment to compile information on local bylaws, including those providing local authority to enforce nonessential watering restrictions, and to regulate the use of private wells.
- 6.3, DCR – wunderground.com seems to be developing a robust inventory of additional data points that could prove useful to this and other weather related efforts.
- Propose in *Section 6.4 Department of Environmental Protection (MassDEP) (page 45)*, the following change:
 - “MassDEP’s Water Management Act Program tracks the implementation of water use restrictions by registered and permitted communities across the state and regularly prepares maps showing the status of restrictions.”
 - Share this information at Task Force meetings.
- 6.4, DEP – this underscores the need to rectify incomplete information in the Southeast Region, poor interpretation of the WMA and incoherent “grandfathering” of water use that was expanded under the 1960’s emergency law that was never intended to systematically destroy regional resources through non-permitted interbasin transfers.
- 6.5 DAR – emphasis on monitoring crop losses and providing information on financial assistance is not a proactive approach. Cites harmful practices by some farmers during 2016 drought. Requests that DAR provide assistance to farmers on how to use irrigation water efficiently. Requests provision of traveling water trucks or water-efficient irrigation equipment.
- 6.5 DAR – add section on Water News (similar to Energy News) to the “Farm and Market Report.”
- 6.6, DFG – Water Suppliers and municipalities should be required to partner with DER (and DFG) in order to develop resilient water management policies—i.e. BROCKTON.
- 6.7, DPH – ...Information should be conveyed to private well users relative to the interconnected condition of the aquifers, since generally people do not seem to understand that the water in this region is connected and their use impacts all. Might reference later discussion on private well regulations.
- 6.8, DPU – “...including regulation of tanker trucking for swimming pools and others, and bottle-water companies?”

Section 7: Drought Preparedness and Response Actions of State Agencies

- 7.1 State Agency Drought Preparedness Actions – In table on p 40 states, “Develop recommendations for legislation to implement statewide outdoor water-use controls.” Why is legislative action necessary? Governor already has authority in Emergency. Unclear if it would be restricted to during a drought- if language remains make clear if it is for a drought and clarify to what sector it applies (i.e. state, pws, private wells).
- 7.1: Table 9 (p. 38-39): Suggest inserting “Agencies” in the caption of Table 9; this would be consistent with the information presented in this table. In several sections of this table, reference is made to the Massachusetts Water Conservation Standards. I suggest that it appears consistently. Currently, it appears either in plain text format, italicized, or as web-link.

- Support the inclusion of “Table 9: State Preparedness Actions” in *Section 7.1 State Agency Drought Preparedness Actions (page 38)*. This table provides greater clarity regarding the responsibilities of relevant agencies in ensuring improved responses to future droughts. We ask that additional information is provided in this section regarding the timeline for implementation of the new tasks assigned to each respective agency and what entity will be responsible for overseeing the progress of each task.
 - Informing Drought Task Force members and others on the progress made and the opportunity to review draft reports would be useful for discussion at Task Force meetings.
- Under “Data Gathering, Analysis and Reporting” in the “MassDEP” category, “Gather data on which municipalities have passed bylaws confirming their authority to require nonessential outdoor watering restrictions, and those that have incorporated local bylaws requiring these restrictions for private wells.”
- Under “Policy and Regulatory Action” in the “DMTF” category, “Review the *Massachusetts Drought Management Plan: Preparedness and Response* every five years in conjunction with updates to the State Hazard Mitigation and Climate Adaptation Plan and update as needed.”
- Under “Water Conservation” in the “All agencies” category, “Coordinate with farmers and growers in the agricultural community to ensure water savings programs are well-publicized and incentivized.”
- We support the proposal by the Green Industry Alliance of Massachusetts that recommends that all newly installed irrigation systems be registered and inspected at the local level.
- Tables 9, 11b, 11c, 11d – Technical Assistance sections should identify MWRA Emergency Connections as a last step, with DEP approval.
- Table 9 State Preparedness Actions – distinguish which elements represent ongoing work and which are new action items.
- Table 9, under Policy and Regulatory Action – references newly filed legislation on policy on planning for and mitigating impacts of water scarcity and requests copy of “legislative recommendations relative to statewide outdoor water-use controls that EEA will be drafting.”
- Table 9, under Communication, private wells – Please include appropriate timing and proper watering strategies to conserve.
- Support the inclusion of “Table 10: State Drought Guidance” in *Section 7.2 State Agency Drought Response Actions (page 40)*. This guidance includes the appropriate corresponding restrictions for each drought level that will ensure water is conserved efficiently and effectively in times of water scarcity. It will also provide support to communities that seek to implement stronger watering restrictions than defined in their permit that want additional justifications for doing so.
- Table 10 State Drought guidance – support for inclusion of suggested non-essential outdoor water use conservation action in the final plan.
- We feel there should be timelier and stronger provisions made to protect water supplies and the environment in sub-basins that are already stressed according the Commonwealth’s groundwater and biological categories. Restrictions and bans on non-essential water use should kick in earlier in such areas and ideally be driven by streamflow indicators.
- Tables 9 and 10 – acknowledge and agree with Table 9—Policy and Regulatory need and Table 10 regarding non-essential out door water use.
- 7.2.1, Mild Drought – ...when precipitation levels signal a mild or moderate drought—we are heading for extreme and you do not acknowledge the damage this has and will continue to inflict on the ecosystem.
- Propose in “Table 11a: State Agency Drought Response Actions During a Level 1 Mild Drought” in *Section 7.2 State Agency Response Actions (page 42)* the following change:
 - “Apply the Massachusetts drought management nonessential outdoor water-use restrictions to all state entities and encourage other water users to do the same.”

- Under Financial Assistance, provide grants to Regional Planning Agencies to assist communities in preparing a Drought Management Plan.
- Section 7.2: Table 10 (p. 40-41): Suggest that the text associated with Table 10 makes it clearer that the restrictions listed in this table apply to and be part of the water conservation response actions in Tables 11a-11d. The caption of Table 10 should also be more specific; for example, “Nonessential Outdoor Water Use Restrictions at the different Drought Levels”.
- Although this was perhaps outside the scope of the plan revision, we strongly recommend that more mechanisms and procedures be developed to better operationalize the plan and that non-essential water use restrictions need to be mandatory, at least in level 4 & 5 sub-basins.
- 7.2 State Agency Drought Response Actions – Clarify whether the actions in Table 10 apply to all users or properties and facilities owned by the state. If Table 10 applies to all, propose the actions should be modified to the following:
 - Level 1: Voluntary Odd/Even (or equally restrictive or equivalent) Watering Restrictions after 5 PM or before 9 AM
 - Level 2: Mandatory Odd/Even (or equally restrictive or equivalent) Watering Restrictions after 5 PM or before 9 AM
 - Level 3: 1 day per week watering (or equally restrictive or equivalent) Watering Restrictions after 5 PM or before 9 AM
 - Level 4: Ban on all non-essential outdoor water use
 - Section should also state that permit conditions supersede this guidance
 - Include language that those with system specific plans should follow their plan’s triggers and response actions rather than the State Plan
 - EEA should consider unintended water quality consequences related to water age. Add language that allows systems to submit documentation to MassDEP for a waiver for systems challenged by maintaining compliance with SDWA requirements
- 7.2 Table 11a – If actions are specific to state agencies, then “advise local governments to introduce outdoor watering restrictions, if not already in place” should be stricken from Table 11a.
- 7.2 Table 11b – “Continue water conservation activities of Level 1” not consistent with table 10 chart. Should say “apply next level of water use restrictions at all state properties and facilities”. As with comment on Table 11a, strike the advise local government language.
- 7.2 Table 11c – Strike advise local government language here. Why does “apply MA drought management nonessential outdoor water-use restrictions to all state entities” first appear at the critical level? Should it not start at the mild stage or should this language consistently appear in tables a, b and c?
- 7.2 Table 11d – Aren’t you wanting to restrict some essential uses in the Emergency stage? As with above, strike non-state agency language.
- 7.2 Table 11c and d – suggest change wording from “all public waterworks” to “Public Water Systems” which is the MassDEP term.
- 7.2.1 to 7.2.4 State Agency Response Actions – under Water Conservation in each table, make language on actions and affected entities consistent across all levels. Or clarify the intended distinctions.
- Private wells – If the state decides to impose restrictions upon all water users, they will need to be clear that the enforcement authority for private well owners resides with the State or with the local Board of Health and not with the Public Water System.
- Tables 11a, 11b, 11c, 11d – clarify which elements represent ongoing work and which are new action items.
- Need parallel effort to operationalize the plan and require water restrictions and conservation measures during droughts.
- The state should consider fostering the development of new water sources as a way to provide redundancy opportunities and to increase the resiliency of our water supply systems.

- The primary goal of future DMP updates should be to look at changes that will allow our water systems to reliably supply water during the worst drought conditions. Encourage EEA/MassDEP to conduct an immediate review of the WMA regulations and revisit them with the lens of ensuring adequate water supply for public health and safety needs. EEA should evaluate incentives and streamline regulatory barriers to rapid development of new sources to enable system resiliency.

Section 8: Drought Preparedness and Response Actions – Guidance for Communities

- Sec. 8 Guidance for Communities – information is helpful to communities
- 8.1 Community Drought Preparedness Actions – Question emphasis placed on water rates and why first. Other actions have a much better chance of reducing water waste.
- Section 2 Develop a Local Drought Management Plan – Agree this is very important. Typo in 3- says we highlight 10 actions but there are 11 listed.
- All towns should be required to develop a comprehensive drought management plan...vital to local drought response.
- Urbanization and impervious surfaces reduce the capacity of land to infiltrate water. Highlight important connections between land use and water management in local planning efforts: Reducing effective imperviousness of land and employing Low Impact Development techniques in all new development and redevelopment; preserving natural vegetation, using native plants.
- Table 12 – suggest replacing language related to nonessential outdoor watering with our recommendation from above (bullet #21 in previous section)
- Releases- Drought Plan does not mention curtailment of releases upon declaration of drought. Drought Plan should specifically require curtailment of any releases upon initial indication of drought conditions at the Level 1 stage. Any permits issued by the State with required releases should be modified to reflect that these releases will not be required if a system is concerned about the adequacy of their supply and/or upon initial drought declaration.
- Support *Section 8.1 Community Drought Preparedness Actions (page 48)* “Action 1: Develop a Water Conservation Program.” The additional focus on long-term planning and year-long water conservation efforts conveys the importance of continuous messaging and preparedness for municipalities.
- Propose in *Section 8.1 Community Drought Preparedness Actions (page 52)* “Action 2: Develop a Local Drought Management Plan” that additional information is provided under subsection 4 “Establish Triggering Levels” to clarify how local trigger levels will correspond with drought declarations from EEA regarding the status of respective drought regions.
- Propose in *Section 8.1 Community Drought Preparedness Actions (page 54)* “Action 1: Develop a Water Conservation Program” and “Action 2: Develop a Local Drought Management Plan” that a reference is made that financial support for these actions can be achieved through the state Municipal Vulnerability Preparedness program.
- Encourage communities to include water conservation and drought management considerations in their MVP plans.
- MVP action grants could be considered as one potential option for funding detailed local water and drought management plans and related actions such as updating local land use rules. The MVP program is also a resource for local bylaw and regulatory reviews and updates.
- 8.2 Community Drought Response Actions – some response actions would pose an economic challenge to landscape businesses affected by water scarcity and restrictions. Consider comments from commercial agriculture. Policy should integrate best available water –efficiency technology and practices for commercial agriculture.
- Support information regarding AWWA Manual of Water Supply Practices M60. Recommend regional workshops be offered to Public Water Suppliers and municipal officials to assist them in setting up plan (*assume this means local DMP?*). Pay Regional Planning staff to work with local officials to prepare the plan.

- Support the After Action Review by the Drought Task Force to assess the effectiveness of state actions taken to address the drought. Suggest: If improvements are recommended, implement amendments and improvements in a timely manner.

Section 10: Drought and Emergency Declarations: Legal Authorities and Powers

- Support the inclusion of *Section 10.1 Local Government (page 56)*. Additional information and clarity regarding the authority of municipalities to implement nonessential outdoor watering restrictions will aid communities in justifying their respective bylaws and motivate communities without these bylaws to implement them.
- Propose in *Section 10.1 Local Government (page 56)*, the following change: “Municipalities may regulate through such bylaws or ordinances the use of water from public or private water systems, including voluntary or mandatory water-use restrictions.”
- Recommend that the proposed Plan point out the resources available from watershed organizations...data and monitoring results on local resources a valuable tool for municipal officials and local boards.

Section 11: Plan Update and Maintenance

- Propose in *Section 10.2.1 Governor-Declared State of Emergency (page 57)* the following change:
 - “This broad authority should provide the Governor the power to take necessary steps, such as restraining the use of water on private property to address a drought.”
- Plan should be reviewed after next major drought when the plan is used.

Appendices

- Support the inclusion of *Appendix F: Private Wells-Frequently Asked Questions (page 67)*. This section provides greater clarity regarding the impact of private wells on aquifers and encourages conservation of all water resources during a drought, a crucial message to convey in communities that are currently not implementing outdoor watering restriction bylaws that include private wells.
- Propose in *Appendix F: Private Wells-Frequently Asked Questions (page 67)* the following change:
 - “During periods of drought, especially when conditions are severe (Level 1 – Mild Drought and higher) ...”
- Propose that an additional appendix is created to provide guidance for communities regarding their authority to prohibit illicit withdrawals from streams and rivers during a drought. This is a commonly reported issue and only a few communities have addressed this concern through the passage of local bylaws.
- Appendix F – include “I live in the MWRA service area. How does the EEA Secretary’s drought response guidance apply to me?”
- Appendix G – reorient map of MWRA Water Supply Communities to landscape orientation. Add town names and country boundaries to map.
- To Appendix – Add table providing more information about each of the 20 lakes and impoundments. Include surface area, storage volume, maximum and average depth, and average daily withdrawal and demand.
- To Appendix – Add table providing more information on the 90 groundwater monitoring wells. Include well depth, general geological formation, and period of record for each well.