

February 25, 2019

Vandana Rao, Water Policy Director
Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA 02114

Re: Comments on Proposed Updates to the Massachusetts Drought Management Plan

Dear Ms. Rao:

Charles River Watershed Association (CRWA) provided comments on the revised state Drought Management Plan (DMP) at the Water Resources Commission meeting last week. These written comments are intended to supplement those comments. CRWA also strongly supports the comments and recommendations of the Massachusetts Rivers Alliance.

We commend the Secretary, the Department of Conservation and Recreation's Office of Water Resources staff, you and the Drought Management Task Force (DMTF) for developing metrics that will enable the state to identify drought earlier, to assess drought levels more accurately, and to respond to drought. The DMP also provides the necessary flexibility for the exercise of professional judgment by DMTF members. The Plan is a critical component for climate resilience—for public health and safety, and ecology. It is a basic building block as the state and municipalities tackle climate change impacts. We urge you to finalize the DMP in March in order for this plan to be in place this spring.

Drought Levels:

As you recognize, DMP nomenclature is important. The change in the names of the drought levels is far better for informing the public of actual conditions. We strongly recommend, however, that you change "Mild" drought stage to "Moderate." This will more accurately characterize and convey this level based on the metrics. Between the 20th and 30th percentile metrics for index severity level and associated percentile range, particularly for precipitation and streamflow, warrants a declaration of moderate drought. Most importantly, it will encourage the public to pay greater attention to drought and to conserve water early. While we understand that the US Drought Monitor classifies D1 as Moderate, we think this likely aligns fairly closely with Level 1 in the DMP. Importantly, the danger of public confusion between the state and federal drought levels is not likely here because the public would first learn that under the Drought Monitor a region is D0, or "abnormally dry," before both the Drought Monitor and the DMP, move respectively, to D1 and L1, Moderate Drought. We believe this will further a DMP goal of "clarity and consistency of messaging."

With respect to the look back period, the key is to provide the DMTF with flexibility in how it weighs the 36, 24 and 12-month lookbacks. In any response to comments, it would be helpful to include an analysis of the performance of the updated DMP based on the 2016 drought.

Drought Impact Reporting

An on line Drought Impact Reporter will be very helpful and we support the state's efforts to obtain funding to establish this. We also urge that DMTF members from state governmental agencies work to strengthen their own assessment of impacts and reporting. To date, impact reporting this has been largely anecdotal. It is important to document those impacts, which will enable comparisons with normal conditions and also serve as the beginnings of a collective database under drought conditions. The creation of the online portal will certainly assist with this, but is not, we think, a substitute for agency research and assessment. To round out the DMTF and provide additional drought impact data, we recommend that a representative of a watershed association be named to it. Watershed groups bring expertise in local and watershed-wide conditions, and their members geographically diverse members routinely report to them about on-the-ground conditions.

Drought Regions:

It is clear from the comments at Water Resources Commission that the local drought management plans on which MA Waterworks Association and the state are working, pertain to water supply resilience, not environmental resilience. While streamflow and groundwater will obviously factor into the development of those water supply-based drought management plans, the DMP text should draw this distinction.

CRWA understands the logic of dividing drought regions based on counties for efficacy of public messaging/communications; however, the DMP should make it clear that the DMTF will also examine and consider drought levels at the watershed hydrological scale. CRWA requests that you include some language on this in the DMP. The Charles is in two drought regions: Northeast and Southeast due to its location in Suffolk and Norfolk counties. Similarly, other watersheds span several counties, creating the anomaly that a watershed may well have different declared drought levels.

Drought Management Mission Group

While coordination of response actions during drought through an interagency group will be useful on a day-to-day basis, our concern is that this group not add an unnecessary layer to drought assessment: assessment should remain the purview of the DMTF, a body with open meetings that reports publicly.

Model By-Laws

At some point the MassDEP model by-law in the Appendix will need to be updated to align better with the DMP. The model by-law should include language on restricting private well irrigation so that communities choosing to regulate private well nonessential use during drought, have this technical assistance available to them. It would also be very useful for the model by-law to include suggested language for use by communities seeking to regulate direct withdrawals from surface waters, which is a growing problem. These under Water Management Act threshold withdrawals often have immediate impacts on streamflow and wetland resources, particularly direct withdrawals from small streams during the summer months.

Sincerely,



Margaret Van Deusen
Deputy Director and General Counsel