



**Massachusetts Association of Conservation Commissions**  
*protecting Massachusetts natural resources by supporting Conservation Commissions  
through education and advocacy*

September 12, 2017

Karen Crocker, Deputy General Counsel  
Massachusetts Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

Re: Support of Revisions to the Water Management Act/Water Resources Management Program  
Regulations to Require Conservation Conditions for Registrants

Dear Ms. Crocker:

The Massachusetts Association of Conservation Commissions (MACC) supports the petition of the Massachusetts Rivers Alliance to promulgate revised and amended Massachusetts Water Resources Management Program regulations (310 CMR 36.00) to impose conservation conditions for all registrants (as well as permittees). MACC is a non-profit association that supports more than 2,000 conservation commissioners in their mission of preserving wetlands, open space, and environmental protection. MACC provides our support to the conservation commissions and the natural resources through our efforts in education and advocacy.

MACC believes that MassDEP's current program of "grandfathered" registrants (who withdraw more than 100,000 gallons per day (gpd)), and the newer permits (with water withdrawals greater than 100,000 gpd) has created an unfair, two-tiered system that does not meet the goals of the Water Management Act "to protect the natural environment of water and assure comprehensive and systematic planning and management of water withdrawals".

The Water Resources Management Program Regulations (310 CMR 36.00) should be modified for the following reasons:

- The existing two-tiered permitting/registration approach is an unfair double standard that does not meet the goals of the Water Management Act because Registrants do not have to implement water conservation measures, but Permitted users (who might be in the same watershed) must comply with water conservation measures.
- When people do not have to conserve water in dry times, the environment suffers. Unnaturally low streamflow harms rivers and wildlife by increasing nuisance aquatic plants, decreasing dissolved oxygen concentrations, and increasing water temperatures.
- Climate change is occurring; we are seeing more significant changes in the severity of storms and droughts. A unified plan is needed to make sure our communities are prepared for droughts and all water withdrawals must comply with conservation plans.

- Environmental regulations need to be modified over time when it is clear that there is new information about scientific advances or when there is new understanding that the current regulations, permitting and registrations systems are unfair, or not working properly.

We hope you will consider these issues when evaluating the need for applying consistent approaches to all large water users regulated by 310 CMR 36.00 and the Water Management Act. Thank you for your time and consideration.

Respectfully Submitted,  
*Massachusetts Association of Conservation Commissions*

A handwritten signature in black ink, reading "Dorothy A. McGlincy". The signature is written in a cursive style with a large, looping initial "D".

Dorothy A. McGlincy, PG, LSP  
Executive Director