



December 28, 2010

Senator Jamie Eldridge  
State House, Room 213-A  
Boston, MA 02113

Re: Water Infrastructure Financing Commission

Dear Senator Eldridge:

The Massachusetts Association of Conservation Commissions (MACC) is a nonprofit organization representing approximately 2,500 Commissioners across the Commonwealth. Our group is dedicated to educating and supporting Conservation Commissions and promoting conservation of wetlands and other water resources, acquisition and stewardship of ecologically valuable land and preservation of biodiversity across the state. We support your efforts to protect and preserve water resources through new infrastructure and financing mechanisms, and understand the importance of investing in a long-term plan to protect wetlands, rivers, reservoirs, aquifers, lakes, ponds, estuaries and other sensitive ecosystems. We thank you and the Patrick Administration for your dedication to this effort.

MACC urges the Water Infrastructure Finance Commission to identify solutions that take a holistic approach to protecting water resources and, in so doing, preserve vital habitat for a range of freshwater species. For this reason we propose that infrastructure financing consider and incorporate funding to achieve the following:

- Incorporate aggressive water efficiency programs in business, industry and homes, including new conservation policies and water re-use technology;
- Improve transportation infrastructure and planning to ensure passage for fish and other aquatic species at stream crossings. Such improvements should include the redesign and construction of culverts and other structures that prohibit passage. This is particularly important in light of climate change, as anadromous and freshwater species are forced to adapt and migrate to suitable habitats;
- Remove hundreds of outmoded dams that serve no public or environmental purpose by funding dam removal. Empower the Office of Dam Safety and municipalities to include dam removal (not only repair) as an option for dealing with obsolete dams;

- Capture storm water for residential, commercial and industrial irrigation purposes (e.g. collection via cisterns, rain barrels and storm water detention and infiltration basins); and
- Manage stream flows by integrating management of drinking water, wastewater and storm water; financing applicable engineering efforts to balance water budgets within watersheds and sub-watersheds; providing tax relief and other subsidies to promote local recharge of storm water and wastewater to replenish local aquifers; supporting legislation and financing to protect lands in floodplains, river corridors and aquifer recharge areas; building water management systems and structures to better cope with anticipated impacts from climate change, such as intense seasonal rain and drier summers; and promoting, through modernization of building codes green infrastructure (wetlands and rain gardens) over gray infrastructure (pipes and culverts).

MACC suggests state support for the above programs through the following means:

- Create an opt-in “water banking” program that authorizes public water suppliers and departments of public works to charge a reasonable fee, proportional to the demand for new services, for new water withdrawals or increased sewer use. Funds may be used to fund water conservation measures, increase the capacity and quality of wastewater systems and to invest in greener water infrastructure. Measures could include local recharge of storm water and wastewater, water reuse, retrofitting properties with water-saving devices, fixing leaky pipes and land acquisition for wellhead protection;
- Increase funding for state environmental agencies that manage water and ensure compliance with laws protecting rivers, wetlands and aquifers’; and
- Prioritize State Revolving Fund projects according to their environmental benefits.

Thank you for the opportunity to submit these comments and ideas. If you have questions, please contact me at [Linda.Orel@maccweb.org](mailto:Linda.Orel@maccweb.org) or 617-489-3930.

Sincerely,

Linda Orel  
Executive Director