

Comment ID	Chapter/ Page	Date Received	Reviewer	Comment	Response
1	N/A	4/18/2025	Patrick Burke 31 Lake St. Plympton, MA 02367 tpburke@comcast.net (c) 781-588-7195	I am offering my public comment regarding water management planning. I live in Plympton and have counted herring at the dam site for several years and had planned to do so again this year but note that there is NO WATER flowing in the ladder from Silver Lake. I understand this has been the case since January 2025. A clear “path” of flowing water is essential to the herring’s survival. The count was high last year and all those baby herring have been ready to go down stream but are stuck in Silver Lake. I understand there has been drought conditions but also believe the city of Brockton uses the lake for a drinking water supply and this involves diversion. WE must find a balance that takes into consideration the herring population needs in the planning process. An open flow of water is essential as part of the management of water resources. Brockton must be expected to appreciate this. This is important to me and many other environmentally oriented people. Please give this consideration in your planning efforts	The report addresses this concern in two ways: First, recommendation "I" in Section 6.2 constitutes a consensus recommendation to conduct an Integrated Ecological Assessment and Pursue Improvements - this includes lake management options, and improved connectivity of waterways for fish passage. Second, Appendix J of the report outlines ways in which Silver Lake withdrawals could potentially be offset in the future to help increase opportunities for fish passage.
2	N/A	4/25/2025	Joe O'Sullivan jbpkos@comcast.net	Wow, I love that someone is doing this 🙏🏻👍🏻🔄!	Noted and appreciated.
3	N/A	4/28/2025	David Moore 54 Flagg Street, Bridgewater dmoore1949@gmail.com	When and where are these meetings? I would love to get a straight answer from town officials on our local water situation. I attend meetings where the Director of Community Planning and Economic Development is pushing for mega housing projects in town, and our Water and Sewer Supt and Head of the DPW sit there shaking their heads that the utilities, water, sewer and traffic, are not available. In the meantime, we are forced to pay premium rates for water service consisting of chemical and mineral-laden water, and promises that the neighboring town will sell us water, share high sewer rates, and have the same crowded roads. At the same time, we read that neighboring towns are also short on water. Who is running the show, Joe Biden?	The public meetings were advertised at https://oldcolonyplanning.org/waterplan/ This plan accounted for anticipated growth (Section 3) and considered realistic opportunities for regional collaboration. As discussed in Section 6, Bridgewater is currently working to treat PFAS to state and federal standards to protect human health. In the long-term, Bridgewater has indicated interest in utilizing desalinated water from the existing Aquaria plant (through agreement with Brockton), which would comply with PFAS standards and reduce stress on local groundwater resources.
4	Appendix J	5/2/2025	Jonathan Hobill, MassDEP	Hi Joanne and Kara, I had a bit of time to look at the added section to the appendices and I believe it does not reflect the reality of the situation. Without understanding the economic realities of the greater use of the Aquaria water, reading it on its own would make one believe that Brockton is not sympathetic to the anadromous fish when there is a simple solution. It is my understanding that the contract with Aquaria uses over 40% of the water department’s annual budget, taking more water adds to those costs. It is my belief that if the cost of that water were to become more reasonable, that the water department would be able to provide water for fish passage. As you know, many within Brockton are hoping to purchase the plant so that that water could be obtained at a reasonable (affordable) cost to the community. I would like to see an economic analysis added to the appendix that compares different scenarios with the unit cost of water in neighboring communities including MWRA communities. This would provide a better understanding to the public for hesitancy/inability to fully support the fish migration. I also do not understand the caveat in the conclusion section that taking more water from Aquaria could effect Brockton’s WMA registration for Silver Lake. The SJC has determined that registrations are sacred and cannot be conditioned. Let me know if you have any questions, have a good weeked.	We agree that unit cost comparisons would be useful, but without a decisive cost/debt and ownership model, providing such in this report was beyond the scope. TheSteering Committee initially discussed various ownership models for the Aquaria plant, but deemed the topic beyond the scope of this study. Appendix J was an added effort to demobnstrate that greater utilization of desalinated water could offset withdrawals from Silver Lake, and possibly help improve fish passage opportunities. While this stands as a clear possibility as the results in Appendix J suggest, actual coordinated operations between Silver Lake and the desalination plant would depend on additional factors, such as the regional demand for the desalinated water, unit costs (as you correctly note), and local will. The caveat concerning Brockton's WMA registration was added in response to a concern voiced by stakeholders, with the understanding that future policies constitute a form of uncertainty that the plan attempts to capture.
5	N/A	5/18/2025	Community Land and Water Coalition P.O. Box 1699 Plymouth MA 02362 via Katherine Harrelson (katherine.clwc@gmail.com)	CLWC urges the OCPC to consider the impacts of regional sand mining on water quality and quantity in the Plymouth-Carver Sole Source Aquifer, the only source of drinking water for Plymouth residents. We include the following documents as evidence of the harmful impacts of sand and gravel mining to the region’s water supply and urge OCPC to call for stronger regulations of earth removal in Plymouth in order to protect the aquifer. The Plymouth-Carver Sole Source Aquifer Action Plan Produced in 2007 by Fuss & O'Neill for the Massachusetts Executive Office of Energy and Environmental Affairs, the Aquifer Action Plan is considered the definitive document when it comes to protection of the aquifer. Sand and gravel mining is considered a high-risk activity to the Plymouth-Carver Sole Source Aquifer if not properly managed. Vegetation and the upper soil horizons naturally provide a pollution buffer for shallow groundwater. Improperly managed sand and gravel operations may reduce this protection and introduce hazardous materials and other toxins directly to groundwater. In addition, the aquifer’s coarse-grained soil, composed of sand and gravel glacial outwash deposits, is highly permeable and susceptible to the infiltration and migration of contaminants, making it sensitive to human activities and influences. Poorly managed sand and gravel operations pose a significant risk to the aquifer by compromising natural protections and potentially introducing pollutants. Therefore Plymouth should do everything it can to maintain the natural deposits of sand above the water table, so as to not reduce by any further means the filtering capacity of the sand deposits above the water table. In summary, sand and gravel mining requires strong regulation to protect the public water supply and the aquifer. The Aquifer Action Plan is included as Attachment A. Sand Wars in Cranberry Country Produced in 2023 by CLWC, Sand Wars in Cranberry Country is an investigation into the money, politics, and corruption behind sand mining and its silent environmental crisis in Southeastern Massachusetts. The report identifies over 40 unregulated and under-regulated sand mining sites in Plymouth, with over 23 million cubic yards of sand and gravel removed from our aquifer, mostly by the cranberry industry. This sand mining directly removes the filtration device crucial to our aquifer’s health by removing trees and vegetation and dramatically lowering the depth to the water table, further reducing the filtration capacity of earth material. The soil’s capacity to attenuate pollutants before they reach the water table is greatly reduced and even eliminated by sand mining. Sand mining operations also mine directly into the aquifer itself, thus exposing our drinking water to the surface and potential contaminants, such as oil and grease, particulate matter and suspended solids, pathogens, nitrogen runoff, fertilizers, pesticides, herbicides, and PFAS. Sand Wars is included as Attachment B. In summary, we urge you to advocate that earth removal is a high risk activity when it comes to our aquifer, and advocate for stronger implementation of Plymouth's Earth Removal Bylaw, which prohibits excavation of over 10 cubic yards of sand and gravel unless incidental to	Table 2-1 introduces the concern about sand mining, introduced by a member of the Herring Pond Wompanoag Tribe. It is also noted in Section2.1.5 : "One example of a concern is the increase in sand mining in the OCPC region. With increase in sand and gravel prices, landowners within the region have increased extraction of these resources for profit. There is local concern over impacts to water, the environment, and public health from sand and gravel mining, with a statewide coalition organizing on the grassroots level to prevent continuation of these practices (Yu 2024)," and the reference is listed at the end of the report. In Section 4.5.4.3, the concern is mentioned again: "Sand mining and deforestation were repeatedly mentioned as threats to aquifers, with concerns that these activities reduce natural water filtration and increase pollution risks." While the Steering Committee felt that regulating sand mining was beyond its purview, they and this report acknowledge the serious concern. The issue is a broader land-use issue that can be addressed primarily at the municipal level. Broader education about the impacts and risks associated with sand mining, and coordinated outreach to planning boards, etc. could be included in recommended strategies G, H, and I. Specifically, Strategy "H" recommends the improvement of local bylaws for Water Smart Land Use and Integrate into Planning Efforts: "Planning and Zoning Boards, Conservation Commissions, supporting municipal staff, and local elected officials all have an essential role in ensuring enough safe water is available in their communities – for both people and the environment. Decisions that planning staff and boards make about land use have a profound effect on water availability and quality."

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6		5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	My first comment is that while we agreed to the consensus based framework at the outset of this process the weighting of that consensus was inevitably going to be tipped towards water suppliers as water suppliers had many more seats at the table than environmental organizations. Understanding that, I was surprised by the public meeting hosted on zoom to so prominently feature mentions of the participation of environmental groups in the process given the limited influence we were able to exert when it came to the weighting of options.	While the Steering Committee was composed largely of water supply representatives, as you note, it also had strong voices from environmental advocates and town planners for environmental concerns. The group also recognized the inextricable linkage between drinking water quality and environmental health - this was a consistent topic of discussion throughout the project.
7		5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	I also understand that when it comes to setting priorities there is an obvious and justified desire to elevate access to clean and sustainable drinking water supply as it is fundamental to life itself. Food is as well, and during the meetings that helped guide this report I commented on more than one occasion that in these times of uncertain supply chains and changing climate I have personally and professionally become worried about this region's ability to sustain itself should the places that currently provide most of our food become incapable or unwilling to do so. I believe restoring our region's fisheries is the answer and that gets us back to water management.	Appendix J to the report is a first attempt by this group to address the fisheries question in a somewhat quantitative way. Its analysis suggests that greater future reliance on desalinated water from the existng plant in Dighton could potentially improve opportunities for fish passage and better connectivity of the aquatic ecosystem. It remains a challenging issue, and one that the proposed Water Resources Committee can potentially address more directly and locally in the context of regional recommendations in this plan.
8	Appendix J	5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	I do not believe the plan in Appendix J to attempt to manage flow at Silver Lake and Forge Pond specifically to target outflow during the seasonal herring run is adequate - particularly because I do not believe the City of Brockton has that fine of control on the available water in the area. For evidence, I would offer up this year where our river herring spawned unproductively in a crowded spillway at Kelleher Dam after bumping into the impassable concrete structure. They did this, because we have not had flow out of Silver Lake since last July. This has continued to strand the hundreds of millions of juvenile herring that were born into the lake, although it is unclear if any remain. It has also rendered the lake inaccessible for adults this year. Two years of progress on restoration - heavily funded by the state and federal government, undone because Silver Lake was withdrawn down too far for even this incredibly rainy Spring to repair.	Acknowledged - any benefit of reduced dependence on Silver Lake would need to be carefully coordinated and tested. The anlaysis simply suggests that recognizable benefits are possible based on historic huydrology, and the climate change assessment in Section 3 suggests that natural conditions in the future may tend toward wetter conditions as well.
9	Appendix J	5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	The lake cannot be utilized recklessly if we want to be able to easily reconnect it when desired, thus Brockton will need to withdraw less water outside of the timeline specified in Appendix J - which if we're already going that far we might as well just connect flow year round and benefit other fish species too. It is the only solution that does not rely upon luck with droughts and a gentleman's agreement that behaviors will change. Otherwise I fear we will still miss runs due to irrecoverable lake conditions - and losing periodic generations will make the prospect of ever restoring our herring populations to the maximum amount that Silver Lake can support unlikely.	The analysis in Appendix J simulates reduction of withdrawals year-round. The results focus on the cumulative IMPACTS during times of year that are important for fish passage.
10		5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	On a final note, I commented during one small group meeting on Zoom that I do not believe that a city has itself had issues with supplying water for itself - invoking occasional emergency action by the legislature, should be suggested to be a regional water supplier for other municipalities. In the event that we have another devastating drought that withdraws Silver Lake down to Brockton's input pipe - what will happen to those other communities relying on Aquaria? It could happen, it has nearly happened within the lifetime of most people who participated in the creation of this report, and to get ahead of that problem I would suggest Brockton take the entirety of Aquaria - an alternative that as far as I can tell was not scored. An expanded Aquaria plant could ensure Brockton its own sustainable supply of water, still taking the safe yield of Silver Lake (approximately 4 million gallons per day). This would meet their needs with perhaps a little left over to sell.	The intent of alternatives "F" and "S" (Maximize use of the desalination plant in the short-term and long-term, respectively) aim to reduce water stress on the region by bringing a new source online, with capacity higher than has been utilized in the past. Utilizing up to the current capacity of the plant in the near term (~4mgd) and expanding its capacity in the long-term were consensus recommendations of the steering committee, both to alleviate local concerns about PFAS in groundwater, but also to reduce the dependence on hydrologically stressed water sources.
11		5/18/2025	Jimmy Powell, Kingston Resident (jimmyspowell@gmail.com)	Thank you for your attention, I do believe the participants in this process were all doing their best to make decisions that they thought were beneficial for those they represent and I know people put a lot of hard work into this process. Unfortunately I do not believe the alternatives put forth address the needs of my Town or the fish I work to restore.	Recommendation "I" in Section 6.2 recommends a more detailed ecological study for the region as a whole in the form of an Integrated Ecological Assessment that would evaluate local flexibility in surface water management, and opportunities to improve connectivity throughout the ecosystem. The proposed Water Resources Committee could help identify funding opportunities for such a study, as it was a consensus-based recommendation.
12	N/A	5/17/2025	Plymouth Stewardship Alliance (plymouthstewardshipalliance@gmail.com)	Re: Comments on OCPC Regional Water Plan Submitted by Plymouth Stewardship Alliance The Plymouth Stewardship Alliance is a network of individuals who care deeply about the health and sustainability of our land, water, and air. The experience of our members in environmental protection and preservation spans many decades. We are pleased to submit the attached comments on the OCPC's draft Regional Water Plan. Two sets of comments are provided. One focuses on water conservation, the other on hydrologic concerns. The report is comprehensive, contains a wealth of information and, we hope, will be relied the attached comments on the OCPC's draft Regional Water Plan. Two sets of comments are provided. One focuses on water conservation, the other on hydrologic concerns. The report is comprehensive, contains a wealth of information and, we hope, will be relied upon by all seventeen communities and the other project partners as they navigate around the many challenges that lie ahead. We share with you the goal of producing a plan that is high quality, fact-based, and actionable. Our hope is that your team will carefully consider the points raised in these comments and revise the report where needed. We would appreciate confirmation by return email that you received our comments and an explanation of how your team will determine the need for revisions to the draft report. Any other feedback or questions will be welcomed. On behalf of the Plymouth Stewardship Alliance, Eric Cody, Art Desloges, Sharl Heller and the Southeastern MA Pine Barrens Alliance, Paula Marcoux, Nancy Mukundan, Peter Schwartzman, Margaret Sheehan, Hampton Watkins, Don Williams	Noted and appreciate the comments received by the Plymouth Stewardship Alliance.

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13	N/A	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	This document contains comments on the Old Colony Planning Council's (OCPC) draft Regional Water Plan (DRWP) submitted on behalf of the Plymouth Stewardship Alliance, a network of individuals who care deeply about the health and sustainability of our land, water, and air. The experience of our members in environmental protection and preservation spans many decades. Thank you for the opportunity to submit comments on the DRWP. The comments below were developed by myself (Peter Schwartzman) and endorsed by the members of the Plymouth Stewardship Alliance indicated on the associated cover letter. I am commenting as a professional hydrogeologist with a focus on the hydraulic connection between groundwater and surface-water features (ponds, lakes, streams, rivers, marine water). I participated in one of the DRWP focus groups for private well owners, and I own property on a pond that has been assessed as impacted from municipal groundwater withdrawals (Savery Pond in Plymouth). I am a board member of the Savery Pond Conservancy; however, the views expressed in this letter are entirely my own. Overall, I would say that most all of my perspectives and concerns are represented in at least one location in the DRWP. As I expressed these viewpoints during the focus group, I appreciate that they were included in the DWRP. However, I would also note that some of these concepts are relevant to multiple elements of the DRWP but are presented in only few, isolated locations. I believe that these somewhat-universal concepts should be recognized wherever relevant to DWRP elements. In terms of applying these concepts to strategies and actionable items, one concern that arises in my review of the DRWP is that it seems to summarize consensus-based findings and strategies derived from the stakeholder/public engagement process performed to date. Because the DWRP is synched with views already expressed, I am concerned about how legitimate additional perspectives can be incorporated into the plan. I am hoping that there is room to revise plan elements and/or make mention of legitimate perspectives that apply to recommended strategies and approaches. Below I list the key themes that I've identified and feel should be addressed in multiple locations in the DWRP. I then provide an itemized list of where such insertions make sense.	Noted and appreciate the comments received by the Plymouth Stewardship Alliance.
14	N/A	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	Key Themes/Concepts A. The most significant key concept identified in my comments is the need to include consideration of how groundwater pumping affects surface-water features due to the natural hydraulic interconnection between groundwater and surface-water. Although this concept is mentioned once or twice in the existing document, there are numerous instances where discussions of water resource management strategies should include consideration of groundwater/surface-water interactions but do not. B. Groundwater pumping impacts on ponds and streams doesn't just influence the quantity of water flowing through these features, but can also influence the quality. Less inflow of good quality groundwater can reduce the amount of dilution of anthropogenic contaminants in these aquatic features, thus leading to higher concentrations (e.g. higher nutrient concentrations can cause algal blooms). C. Discussion of integrated ecological assessments seems to focus on rivers and reservoirs, but the same type of assessment is needed for ponds, lakes and streams - particularly where they could be affected by new groundwater withdrawals. D. Expanded emphasis on proactive monitoring to better understand hydrologic systems and use of the collected data to assess system function. Rigorous methods should be used to assess the hydrologic and ecological impacts of proposed water resource management strategies. Suggestions are provided to make monitoring strategies more comprehensive. E. Confirmation is required that prediction of future hydrologic conditions includes consideration of warmer temperatures. F. Noting concepts regarding the similarities and differences in management strategies for municipal and domestic (private) water supplies. Noting the need for transparency in setting regulations for private wells. G. Miscellaneous suggestions to improve wording, graphics, etc.	Noted and appreciate the comments on these key themes and concepts. Specific responses to these themes are addressed in each itemized item below.
15	Forward	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	1. Forward: In describing actions and strategies included in the plan, I recommend mentioning data collection, as this is indeed mentioned in the plan but not the forward. The rationale is that we can't manage what we don't understand!	Data collection added to Foreward.
16	ES	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	2. Section ES.1: The first paragraph employs the term "sustainable". This term has been used with many different meanings across the water resource management literature. Therefore, it has become commonplace to define what is actually meant. I would suggest defining "sustainable" as using the water resource within the bounds of availability and without causing undesirable hydrologic, environmental or ecological impacts. Other considerations may also be applicable, but a definition is warranted.	Definition added in second paragraph of ES.1
17	ES	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	3. Section ES.4, Bullet List: The mention of "healthy ecosystems" should not only reference rivers and streams but should also reference ponds and lakes.	Ponds and lakes references added
18	ES	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	4. Table ES-1, G: As mentioned below in item #30 below, I suggest that monitoring and continued education (and focused studies) are sufficiently important to be called out individually	See response to #30 below.
19	ES	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	5. Page ES-4, ¶ 1: Discussion of monitoring significant trends should include monitoring hydrologic conditions that may be impacted by new water resource development.	Added hydrologic conditions
20	1	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	6. Section 1.2, 2nd Bullet: Discussion of strained ecosystems should mention " the effects of groundwater pumping on ponds and streams"	Added: "the effects of groundwater pumping on ponds and streams"
21	1	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	7. Section 1.2, 3rd Bullet: Discussion of water quality degradation should mention that reduced natural flows (e.g. both groundwater and surface water entering streams and ponds) can degrade water quality by reducing dilution of anthropogenetic contaminants.	Added: "Changes in flow conditions can also affect dilution and residence time of pollutants, both of which can impact water quality in receiving waters."
22	1	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	8. Section 1.2, 4th Bullet: Suggest clarifying the use of “groundwater” when discussing streamflows. Use of “baseflow” or “groundwater supported baseflow” would be clearer.	Clarified with "contributions from groundwater"
23	1	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	9. Section 1.2, 5th Bullet: Discussion of climate variability should acknowledge both changes in precipitation and changes in temperature. Increased temperatures lead to increased “losses” from the water resource to evapotranspiration (ET). Increased ET can lead to reduced groundwater recharge and therefore reduced stream baseflows and increased potential for saltwater intrusion. Discussion of the USGS hydrologic analysis (Appendix B) mentions consideration of ET, but does not specifically state that temperature is considered in performing the water balance (please confirm and/or address).	Added: "including precipitation and temperature"

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24	1	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	10. Section 1.3, Final ¶1: This is the appropriate location to categorically state that groundwater and surface water are not hydrologically independent but are instead interconnected. In that way, hydrologic changes imposed on one can cause hydrologic changes in the other. A good reference is USGS Circular 1139 ("Ground Water and Surface Water: A Single Resource; Winter et al., 1998).	Added: "which are interconnected resources"
25	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	11. Table 2-1: The table documents concerns of residents with private wells about groundwater availability during times of low precipitation. Somewhere in this report it might be worth mentioning whether this is a known/documented phenomenon or whether it is a "data gap" worthy of better understanding. Water resource management decisions should be made based on actual conditions rather than purely on concerns.	Added "studying" before impacts on water availability during times of low precipitation to demonstrate that this needs to be evaluated
26	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	12. Page 2-3, ¶2: Provides the currently applicable regulatory definition of "safe yield" and notes the difficulty of estimating safe yield due to groundwater/surface-water interconnection. The regulatory definition seems to be limited to water resource availability and does not include consideration of undesirable environmental impacts when defining "safe". I recommend inserting a sentence recognizing that despite the extent of the regulatory definition, consideration of environmental impacts should also be included when managing a water resource for safe yield.	Added "along with other impacts (i.e., environmental)."
27	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	13. Section 2.1.1.3, ¶1: I am overall happy with this paragraph. However, the reference to "decreasing pond depths in Plymouth" would be better described as "reduced water levels and/or rates of freshwater flushing in Plymouth Ponds". [For instance, reduced groundwater flushing through Plymouth's Savery Pond was identified as a key cause for increased nutrient concentrations in the pond (TMDL Solutions LLC and U Mass Dartmouth, October 2021)]. Also, discussion of rebalancing groundwater withdrawals would be improved by mentioning the amount, timing and location of withdrawals.	Change made.
28	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	14. Section 2.1.2.1: In discussing surface-water quality, it would be worth mentioning that surface-water quality can be impaired by groundwater conditions, both directly by impaired groundwater quality (e.g. anthropogenic contamination of groundwater that discharges to surface water) and indirectly when groundwater pumping reduces inflows to surface water features, thus reducing dilution of anthropogenic contaminants. [Same Savery Pond example as mentioned above in #13.]	Added text that surface water and groundwater are interconnected resources.
29	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	15. Section 2.1.2.2: In discussing concerns regarding groundwater quality, it may be worth including nitrate and microorganisms associated with septic loading.	Added "Discharge from septic systems can also affect groundwater quality. "
30	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	16. Section 2.1.2.3, ¶2: In discussing manganese as an aesthetic water quality concern, it might be worth noting recent research suggesting that much lower concentrations of manganese may present health concerns. I think you can find this in the available online literature, and if regulations were to change accordingly, this could increase issues associated with managing manganese.	Added "Any state or federal regulation changes on iron and manganese will need to be monitored by water suppliers in the future."
31	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	17. Section 2.1.2.3, ¶4: Given the prior discussion of PFAS, it might be worth adding here that private wells are not protected because they typically are not monitored (just to improve well owner awareness).	Change made.
32	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	18. Page 2-10, Final ¶1: In discussing loading of nutrients to natural waters, this is again an appropriate location to note that reductions in groundwater discharge to streams and ponds due to groundwater pumping can increase nutrient concentrations by reducing the dilution effect of clean water inflows on contaminant sources. Again, if an example is needed, Plymouth's Savery Pond would be appropriate.	Text includes " These substances can migrate into groundwater or surface waters. "
33	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	19. Table 2-5: In listing how the Regional Plan addresses water resources concerns, "water availability" should mention groundwater level and streamflow monitoring, and "water quality" should mention opportunities for groundwater quality data collection (e.g. from homeowner well testing) and/or monitoring. Optimally, collected data should be used to improve understanding of hydrologic conditions, not just left dormant!	added "including groundwater level/streamflow monitoring, water quality data collection"
34	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	20. Section 2.2.1, ¶3: In discussing existing monitoring and data collection, it strikes me that this is pretty limited. It may be worth noting that increased such activity would be useful for managing the water resources of the area. 1 https://www.plymouth-ma.gov/DocumentCenter/View/1666/Savery-Pond-Management-Plan- Oct-2021-PDF	Added: "The more scientific data that can be made available in future years, the easier it will be to prioritize resource management decisions and measure their impacts."
35	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	21. Section 2.2.2: In noting the fact that most public water suppliers depend on groundwater wells, it may be worth again acknowledging the hydraulic connection between groundwater aquifers and surface-water features (e.g. streams, ponds).	This has been added in the background information above.
36	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	22. Figure 2-9: Unless it makes this figure too busy, I recommend updating it to show more of the actual ponds and streams in the area. Because groundwater pumping can affect ponds and streams, this would illuminate the real potential for associated hydrologic impacts.	As figure states, see Appendix A for more specific information.
37	2	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	23. Page 2-23: In discussing Residential Gallons Per Capita Per Day, it might be worth relating the values shown to large-scale regional averages to indicate how good the OC area is doing (as indicated in Table 2-8) for water conservation.	Water Efficiency is covered in Appendix D.
38	3	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	24. Section 3.3: Consider mentioning that improving inhouse water efficiency does not provide much benefit in areas where domestic wells discharge to septic systems (extra water use just goes back into the ground).	This was not discussed by the Steering Committee.
39	3	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	25. Section 3.4, ¶12: Consider replacing "homogeneity" with "high level of interconnectedness" – as this provides a more understandable term for the lay reader.	Change made.
40	3	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	26. Page 3-8, Final ¶1: As this is a monitoring recommendation, it is worth noting that monitoring should be initiated ASAP in order to define background conditions rather than initiating monitoring once a proposal is underway. Without understanding background conditions, monitoring may not be able to identify changes associated with new water supply development. I also recommend reconsidering the statement that the four USGS monitoring wells were sufficient to characterize regional hydrologic trends, as the USGS model did not match the trends measured in some of the monitoring wells. Please have a look and consider whether this statement is accurate.	Added the following to Recommendation G in Section 6: "Monitoring should be strategic, but need not wait until future studies are underway – having more historical data is always beneficial." Regarding the adequacy of the four wells for modeling, we focused on the well with the longest record which was also least impacted by nearby withdrawals, as a general proxy for groundwater availability trends and future climate vulnerability. The study did not conduct multi-dimensional groundwater flow modeling. For the intended purpose of trend analysis, the data were sufficient.
41	3	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	27. Pages 3-14 & 3-15: Discussions of meteorological droughts consider changes in precipitation but now how projected warming would increase evapotranspiration (ET) and thus reduce groundwater recharge. While it's possible that increased precipitation could exceed increased losses to ET, this discussion should address both components of the water budget.	Agree with this factual statement. This particular analysis was targeted specifically at rainfall trends. The coupled effects of temperature are addressed on pages 3-8 through 3-13, where future streamflow and groundwater trends are simulated as a function of future precipitation and temperature. The analysis in Section 3.4.1 is intended only to help corroborate findings, and not stand on its own as the drought projection.

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42	4	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	28. Table 4-4: Regarding the recommendation that outdoor water use be restricted when restrictions apply to municipal water users, this issue may benefit from additional discussion in the report. I suggest that there should be transparency as to why private well owners should conserve during such times. For instance, if municipal water use restrictions are based on the capacity of municipal infrastructure (wells, conveyances) rather than the amount of groundwater contained in the aquifer, why would these restrictions apply to private well owners? However, if restrictions are enacted because we know that the aquifer system is stressed, it makes sense that restrictions should be universal. And, given the interconnection between groundwater and surface water, it may make sense to universally apply restrictions during drought periods to protect sensitive surface-water features. It may also be the case that not enough data are available to know how “at risk” aquifers and connected surface-water features are due to normal (or even increased) water use during drought conditions. If it is the case that this knowledge is not available, the rationale should still be communicated to justify the restrictions (e.g. reduced recharge can affect surface-water features, so we should all reduce our consumptive water use in order to protect these features).	Noted. This is later discussed in recommendations section.
43	5	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	29. Section 5.4.1, ¶3: Discussion of risk assessment for new public water sources includes possible treatment for contaminants of emerging concern (e.g. PFAS). Another risk not mentioned in this section is that environmental impact assessments (assessing the impacts of new groundwater pumping on the hydrology/ecology of ponds and streams) may force a purveyor to locate new wells in more costly areas in order to avoid such impacts. If groundwater/surface-water connections are acknowledged, then the location of a new well may be affected by these EIA considerations.	Agreed with these notes. The risks have been left as is as they were formulated by the Steering Committee, however language is included that states: "This risk matrix is not intended to be exhaustive or reflect the numerical probabilities or the full potential breadth of impacts. Rather, it is intended to add narrative qualifications or support to alternatives of perceived value to the region."
44	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	30. Table 6-2: The following comments: a. From item “G”, I recommend separating out 1) improved monitoring and data management and 2) public education; and adding 3) hydrologic and ecologic studies to guide water resource management strategies. This provides significance to each item; avoids blurring boundaries between the three; and avoids the implication that they must be managed together (each can stand independently, although I acknowledge that all three can support one another). b. All three of these items are applicable at both the local and regional scales, so should be mentioned under both categories. c. Ecological assessment (item "I") should include hydrologic impacts and associated ecological impacts. As mentioned below in my comments on Appendix I, the definition of ecological impact assessment may need to be broadened. d. The wording used to discuss desalination should be reconsidered. If it is (in fact) the most expensive method, maximization should occur where other options are unacceptable.	We feel that we should leave this recommendation exactly as it was formulated by the Steering Committee. Note that the ecologic assessment is a standalone option (Alternative I). We believe that the group acknowledged that these recommendations are applicable at both regional and local scales, but agreed to adopt concerted effort at the regional scale as part of this regional plan, which does not supplant local action. Regarding desalination, the group did agree that maximizing the use of the plant would have multiple benefits for water quality, ecology, and supply reliability, so it is not limited to being prioritized based on cost alone.
45	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	31. Bottom of Page 6-3: In discussing how municipalities can manage water resources to improve ecosystem health, an additional bullet should be added that states that development of new groundwater sources should consider how the new pumping would affect the health of surface-water features (ponds and streams) that are interconnected with groundwater.	Change made.
46	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	32. Page 6-8, ¶1: Change “surface and groundwater flows” to “surface-water flows and groundwater levels” (because groundwater flows cannot be easily measured).	Change made.
47	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	33. Page 6-8, ¶2: Rather than solely mentioning “advocacy efforts to improve streamflow”, add to this “... pond levels and groundwater inflows to ponds”.	Change made.
48	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	34. Page 6-8, ¶3: For the examples of possible monitoring points/activities, consider expanding the recommendations. The following are all relevant: a. groundwater monitoring wells near surface water bodies and near areas of groundwater development; b. pond level gages; c. pond/lake/reservoir inflows and outflows; and, d. flows in streams/rivers not associated with ponds/lakes/reservoirs). All four items can potentially be used to better understand groundwater-surface water interactions, a goal identified in the original text. It’s noted that monitoring streamflows is the most expensive of these three activities! For streamflows (items c and d), it may be worth not limiting it to dry periods, as both dry and wet season baseflows can help identify long-term trends. However (again), the more flow monitoring performed, the more costly!	Added other examples mentioned.
49	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	35. Page 6-6, Bottom Full ¶: This paragraph mentions application of an “integrated ecological assessment”, as described in Appendix I. See comments below on Appendix I.	See repsonse to comment below on Appendix I.
50	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	36. Table 6-4: Considerations for implementation for redundant water supply options for agriculture should include “potential hydrologic impacts to nearby surface-water features”.	Change made.
51	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	37. Section 6.4: This strategy could include a monitoring component to identify areas where groundwater contamination might affect domestic wells. It's also worth noting that domestic wells may be constructed with materials (e.g. Teflon tape on pipe joints) that would create positive detections for PFAS.	Good points. This is covered under Strategy A.
52	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	38. Page 6-26, Second Group of Bullets: Add to this list of recommendations - monitoring of pond levels and water quality of groundwater, ponds (nutrients) and streams.	Change made.
53	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	39. Page 6-27, Item C-b: See my comments on ecological assessment below.	See response to ecological assessment comment below
54	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	40. Page 6-28, Item E: Note that the bulleted list presented here could include the entire list shown on p. 6-26. They would all be relevant to adaptive management. Maybe best to just refer to that list???	Added reference to full list
55	6	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	41. Page 6-28, Item F: As mentioned above, it’s worth noting that domestic wells may be constructed with materials (e.g. Teflon tape on pipe joints) that would create positive detections for PFAS.	Good point. PFAS can come from many sources, so specifics are not included.

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56	Appendix B	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	42. Appendix B: The following comments are provided for Appendix B: a. The introduction to this Appendix should indicate who did the analysis described. b. On Figure A (hydrograph of Taunton River), This may just be noise, but it looks like the 2020 and 2022 low flows were the lowest. Please address. c. This appendix should include a description of how the model algorithm works and should confirm how both precipitation and temperature affect water availability in the model (thus showing that temperature affects stream baseflow, which is sourced by groundwater recharge, which is affected by evapotranspiration). d. Page B-8, Fourth Bullet: The term "drawdown" is most typically used for pumping and dewatering effects, not for natural water-level variations. I would suggest using "seasonal groundwater level declines and rises" rather than "drawdown". e. The discussion of future drought duration and severity (Section B.6) should confirm that future temperatures are included as well as future precipitation patterns.	A. All technical analysis in the report was conducted by the CDM Smith project team. B. The low flows in the Taunton River in 2020 and 2022 are roughly equivalent to those in 2002 and 2016, both of which were characterized by longer periods of dry conditions. C: The appendix includes a reference and web link to the paper that describes the model algorithms: Thomas Jr., Harold A. 1981. Improved methods for national water assessment, water resources contract WR15249270. Prepared for the United States Geological Survey. https://doi.org/10.3133/70046351. Figure B-4 illustrates how the model accounts for evapotranspiration as a function of temperature and soil moisture, and how reduced soil moisture affects both runoff and baseflow. D: Agree - We can replace "drawdown" with "Seasonal Water Level Decline." Change made. E. The analysis in B.6 is aimed exclusively at precipitation trends as a drought indicator. Temperature was factored into the preceding analysis to evaluate future drought impacts. This analysis was careful to distinguish drought INDICATORS from drought IMPACTS.
57	Appendix I	5/17/2025	Plymouth Stewardship Alliance (Prepared by Peter Schwartzman)	include assessment of hydrologic impacts of water resource management strategies on aquatic resources (e.g. pond/stream hydrology and ecology). The following comments are provided for Appendix I, Strategy K: a. The concept of an integrated ecological assessment needs to be extended to ponds and should include recognition of groundwater/surface-water interactions. b. Ecosystem assessment could be performed at the scale of a single pond or stream. The list of items it examines should include "hydrologic processes". c. Since this discussion ecosystem assessment may be referencing an already formalized approach that focuses on streams on a regional/subregional scale - you may want to leave the discussion "as-is". But if that is the case, an additional discussion is warranted to express that a similar assessment is relevant to evaluate the effects of water resource management on ponds at whatever scale suits the problem at hand. d. It is worth noting that the concept of "ecological flow need" (EFN) equally applies to ponds. Groundwater flushing of pond affects residence time and provides dilution of anthropogenic contaminants. e. The discussion mentions hydrological modeling, which (in the case of this report) is associated with a streamflow modeling example. But for ponds that may be connected to both streams and the water-table aquifer, integrated groundwater flow modeling is needed to assess the hydrologic impacts of a proposed water resource management strategy. And these hydrologic impacts need to be considered to estimate ecological impacts. f. "Activities for Consideration" (Section I.5.1) should include groundwater related activities and assessment of impacts to ponds. g. "Lake and Reservoir Management Strategies" (Section I.5.2) currently does not address the impacts of groundwater pumping on ponds; however, this is a significant issue that should be addressed in discussion of assessing impacts of water resource management strategies on aquatic ecology. h. Because this discussion of ecological assessmetn is focused on river ecosystems and, Section I.5, Paragraph 1.	These are excellent suggestions, and will carry through to any future committee overseeing the implementation of the ecological assessment. For the purposes of this report, we did not want to prescribe too many specific details of what an integrated ecological assessment might include or not include (The Steering Committee discussed it at a very conceptual level). This will be up to funding organizations and any subsequent implementation committee. That said, these comments are part of the record of this report and will carry forward to advise future actions as part of the overall body of material.

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58			Plymouth Stewardship Alliance (Prepared by Eric Cody)	Regional Water Plan submitted on behalf of the Plymouth Stewardship Alliance, a network of individuals who care deeply about the health and sustainability of our land, water, and air. The experience of our members in environmental protection and preservation spans many decades. The OCPC draft plan is an impressive document containing a wealth of valuable information. One of its strengths is its comprehensiveness, with a scope that extends from groundwater and surface water hydrology and extraction all the way to water-consuming behavior. A wide array of policies and actions must be applied across this full spectrum if South Shore communities are to maintain a stable, sustainable, and affordable water supply in this era of environmental and economic challenges. The comments provided here focus on one dimension of water policies and actions – water conservation. The report refers to this aspect of water planning throughout as “water efficiency,” referring mainly to “passive” measures such as improved water-using appliance efficiency standards and fixtures, and indicates they are likely to have a short-term impact. The report recognizes the role of progressive rate tariffs (increasing block rate) for encouraging more sensible use of water by more closely reflecting its true, resource cost. The report further identifies proactive water leak detection and possible consumer rebates for fixing them as a promising area for water savings. Moreover, drought-resistant landscapes are identified as a strategy to address both short-term water shortages and climate change. These are noteworthy ideas, all moving in the right direction. We support these recommendations unreservedly. However, the report falls short by failing to consider more “active” forms of water conservation that can be implemented by local Public Water Suppliers, generally referred to as water demand management, and by not considering water conservation as part of a long-term, balanced resource strategy. A report developed by the Plymouth Water Conservation Committee in 2022 noted, “Research into other municipalities’ water conservation efforts, both within Massachusetts and elsewhere in the United States, indicates that a long-term savings	We appreciate the Plymouth Stewardship Alliance comments. Specific responses to comments are provided below individually. We encourage the Plymouth Stewardship Alliance to review Appendix D in detail as it includes water conservation topics for public water suppliers. Additionally, Strategies B, C, H, J, N, O, R, and X support water conservation steps moving forward. These Strategies are descibred in detail in Section 6 of the Report.
59			Plymouth Stewardship Alliance (Prepared by Eric Cody)	Shore towns simply plan and construct more wells since there are billions of gallons of untapped water in the underlying aquifer? Drilling wells carries both economic and environmental costs. The expected cost of drilling a new municipal well is expected to be in the range of \$6-8 million, if not more. How many million gallons of water can be saved by investing some of that money into conservation efforts to defer the need date for the new well by a year, or two, or three? Well deferral of even a single year would save a significant amount of money, namely the carrying cost of debt instruments floated to cover the capital cost. Moreover, the environmental costs of new wells (so-called “externality effects”) are often not considered—habitat destruction, loss of trees with their CO2 absorption capacity and cooling benefits, and disruption of wildlife corridors, to name a few. Water is the resource most intensively “mined” worldwide. Each day, trillions of gallons of water are withdrawn from rivers, lakes, aquifers, and oceans for drinking, irrigation, manufacturing, cooling power plants, and other purposes. However, over-extraction can lead to severe environmental consequences such as groundwater depletion, reduced river flows, and ecosystem disruptions, as the OCPC report alludes to. What has become apparent is that maintaining the status quo of relying exclusively on more and more wells is not a sustainable, long-term strategy. Withdrawing increasing volumes of water from the ground has a number of complex ecological effects here since the aquifer, groundwater and surface water systems are all closely intertwined. Southeastern Massachusetts has numerous coastal plain ponds that are groundwater-fed and rely on stable water levels. Changes in the water table can alter nutrient balances and oxygen levels, disrupting sensitive rare plant and animal species (Plymouth gentian, red-bellied cooter, and rare amphibians, to name a few). Wildlife habitat and water quality can both be impacted by our growing thirst for water. The following comments suggest areas of water conservation that should be considered by the report’s authors to insure that water demand management is fully considered before commitments are made to an unending series of new, municipal wells. In short, water demand management needs to be an equal	Good comments. Strategies B, C, H, J, N, O, R, and X support water conservation steps moving forward. These Strategies are descibred in detail in Section 6 of the Report.
60			Plymouth Stewardship Alliance (Prepared by Eric Cody)	Consumer Education to Increase Awareness of Water Issues The report correctly identifies the need to expand water education and public engagement. We strongly support this recommendation. Pilot programs implemented over a two-year period by the Plymouth Water Conservation Committee led the committee to conclude that consumer awareness of how much water they use, what it costs, and the impacts of their water-consuming behavior is very low. A rain barrel pilot program saw water use by participants decline by nearly 20% compared to previous seasons (finding subject to limitations of the data). The pilot program evaluation report is also provided. Creation of a water conservation flier and its distribution in town water bills, as well as those of at least one other local Public Water Supplier, helped raise community awareness throughout Plymouth and kindled discussion about water use. With the help of students in the Plymouth schools, the committee also created a water conservation poster which can be seen in public places around town.	The pilot program mentioned is an excellent example project that the local and regional strategies B, C, H, J, N, O, R, and X should amplify moving forward in the next stages of this project. OCPC looks forward to speaking further with the Plymouth Stewardship Alliance on these topics.

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61			Plymouth Stewardship Alliance (Prepared by Eric Cody)	Policies to Address High Levels of Outdoor Watering in the Summer The OCPC report discusses at length the role of water restrictions and watering bans during the summer months. If Plymouth's experience is any indication, water consumption in the summer months can be as much as 80 to 100% higher than in other months. This peak-season usage pattern drives capacity requirements on municipal water systems and the capital and operating costs that go with them. The OCPC report recommends that water suppliers implement increasing block rate designs, e.g. the price per unit consumed increases at higher usage levels. This is widely accepted as a progressive practice. However, there is only a single mention (p. 6-18) of the role that may be played by a seasonal peak rate design, such as the one Plymouth implemented in 2024. Outdoor watering is a major driver of summer peak water demand. A seasonal rate design directly impacts consumers who water their outdoor landscapes, often excessively or wastefully (cases were documented where lawn irrigation systems operated in the middle of the day during downpours; others where water was being sprayed onto rooftops by misaligned sprinkler heads; others where lawns were being irrigated inefficiently for a few minutes each day). The principle behind a summer peak rate is that consumers who engage in outdoor watering should pay their fair share of the costs they impose on the water system. Why not just impose more outdoor watering restrictions? There are a number of practical challenges with enforcement of such restrictions. It's not always obvious whether a home is on town water or a private well, and municipalities have no authority over the latter. And municipalities are often hard-pressed to add water enforcement to the scope of work of already stretched town staffing.	Excllent points that need to be taken into account during implementation of local and regional strategies B, C, H, J, N, O, R, and X.
62			Plymouth Stewardship Alliance (Prepared by Eric Cody)	Building the Infrastructure to Deliver Water Conservation Programs and Services While the report recommends that localities undertake water conservation, we were unable to find any discussion of the staffing and technology requirements this will entail. The report correctly points out that highly detailed water usage data become available when advanced water metering infrastructures (AMI) are deployed. In some cases, minute-by-minute usage patterns are available. Moreover, AMI meters often contain flags that indicate conditions such as water leakage, where water usage is recorded through the night, for example. But water departments may not currently have the staff resources to take full advantage of these data resources. This is ironic since water conservation savings can help pay for conservation programs. According to data provided by Plymouth's Finance Director, the town's new peak water rate in 2024, for example, generated an estimated \$192,000 in additional revenues which, one would hope, could be reinvested in water conservation programs to influence demand and defer new wells. Addition of a single staff person dedicated to water conservation could make a world of difference.	Staff time is noted in many of the strategies' resources needs. The Plymouth values are very helpful insight into these benefits and would be great shared during the implementation of next steps in the project.
63			Plymouth Stewardship Alliance (Prepared by Eric Cody)	The Answer is Balanced, Long-term Water Resource Planning that Includes Conservation Water conservation is not an either-or proposition versus drilling new wells. Communities need to pursue all available resources, from new water supplies to water freed up by conservation. Water we do not use is water that does not need to be withdrawn from the aquifer. Water we do not use reduces the burden on pumping and distribution. Water we do not use reduces losses along the water distribution network because it does not have to be delivered. Water we do not use is available for wildlife that depends on it to survive. The OCPC report needs to reach further and help its constituent communities envision a future in which water conservation is a priority function for water suppliers and a frequent topic of discussion among residents. The bottom line is that the OCPC draft regional water plan takes an approach to water conservation that is too tepid. Every municipal water department should include at least one full-time position dedicated to water conservation planning, programs, and tracking. The Massachusetts Department of Environmental Protection should require all the Public Water Suppliers it holds sway over to file an annual report on its water conservation activities and their impacts. All water conservation programs should strive to include homeowners and businesses on private wells—our water all comes from the same place and we all face the same threats to its availability and quality. As Plymouth's water conservation poster says, "It is time we got serious about water conservation. All of us." We urge the OCPC to revise its report accordingly.	The Old Colony Regional Water Plan agrees with the importance of water conservation. The strategies B, C, H, J, N, O, R, and X all support water conservation. The implementation of these strategies will require commitment from municipalities, as noted in the "Resources Needed" section of each strategy table in Section 6.
64		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	The North and South Rivers Watershed Association (NSRWA) would like to offer comments on the Old Colony Regional Water Plan. The NSRWA is a 55-year-old nonprofit organization based on the South Shore of Massachusetts. Our membership consists of approximately 1,500 households, and our watershed spans 12 towns. We serve as the South Shore regional partner of the Mass Bays National Estuary Program and lead the WaterSmart South Shore program, a nonprofit partnership providing water conservation education to 12 South Shore communities: Cohasset, Duxbury, Hanover, Hingham, Hull, Kingston, Marshfield, Norwell, Pembroke, Rockland, Scituate, and Weymouth. More information about the program is available at WaterSmartSouthShore.org.	Thank you to the North and South Rivers Watershd Association for your comments.
65		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	The NSRWA believes regional water supply collaboration and planning are essential for building sustainable, resilient water systems that support both people and wildlife in the South Shore region. Regarding the OCPC draft plan, we would like to comment specifically on how our watershed is impacted by regional water supplies and our hope to see continued regional collaboration that restores natural water systems while building drinking water resiliency for the South Shore.	See responses to comments individually below.

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66		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	Currently, the City of Brockton holds rights to transfer water from the headwaters of the North River at Furnace Pond. This pond and the Herring Brook that drains from it are home to one of the largest river herring populations in Massachusetts. In the past, water transfers from Furnace Pond to Silver Lake for Brockton's water supply have resulted in juvenile herring being transported to Silver Lake. Due to water level drawdowns from Brockton's withdrawals, these fish cannot return to the ocean to complete their life cycle. While we are grateful that Brockton has not recently used Furnace Pond water, there are no guarantees against future use, particularly given climate change pressures. To ensure both the City of Brockton and the region have adequate water supplies for people and wildlife, we recommend considering both the Aquaria Desalination Plant and MWRA hookup as long-term water supply solutions, coupled with aggressive conservation measures that limit and enforce water use for non-essential purposes. The region's water quantity issues are seasonal and will likely intensify with longer, hotter summers.	Strategies on these suggestions are included in Section 6. Strategies F, S, U, and V cover maximizing use of desalinated water supply and MWRA connections. Strategies B, C, H, J, N, O, R, and X all support water conservation.
67		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	Water sourcing from Aquaria and/or the MWRA should build resiliency for people while reducing damage to overallocated local watersheds that suffer from dry streambeds and cannot support local fisheries. We strongly support the plan's recommendation for "conducting an integrated ecological assessment, beginning with a flow study, to identify locations in the region that are known to have histories of natural flow depletion, then establish natural flow targets with timing and work with water providers to determine how progress can be made toward these goals in light of access to water sources outside the region." We note that numerous existing studies can provide the foundation for establishing natural flow targets and supporting decision-making. These studies should compare current water management practices with future alternative water supply scenarios to determine the water volumes needed to restore streamflow to functional ecological levels.	The Report concurs with this comment.
68		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	We strongly support enhanced regional water conservation communication and are pleased to share our WaterSmart program experience with others interested in water education. Several communities in this study already participate in the WaterSmart program, including Hanover, Pembroke, Duxbury, and Kingston. The program addresses both water conservation and water pollution prevention. Massachusetts has also invested in water conservation education materials that could support regional messaging efforts. These programs provide messaging and materials and should be used in local campaigns. The materials are available but what we often find is that there is a lack of capacity and funding in a community to deliver the message in a consistent and timely fashion	Strategies B, C, H, J, N, O, R, and X all support water conservation. Insight from your WaterSmart program experience will be very valuable moving forward on the implementation steps of these strategies.
69		5/27/2025	The North and South Rivers Watershed Association (NSRWA) (Joanne Zygmunt)	We express our support for continued regional collaboration between towns in the OCPC region. For the past two years, the NSRWA has joined informal meetings with the South Shore Chamber of Commerce, Jones River Watershed Association, South Shore legislators, and the Area Planning Commission to discuss regional collaboration among towns north of the OCPC study area, including Weymouth, Hanover, Norwell, Hingham, Hull, Scituate, Cohasset, Abington, Rockland, and the Union Point/South Weymouth Naval Air Station Redevelopment Project. A study funded through the South Shore Chamber, currently being finalized, has conducted interviews with community representatives to gauge interest in regional collaboration around water infrastructure issues. Like the OCPC study, there is demonstrated interest in regional collaboration, but no identified framework exists for convening these discussions. We hope funding can be secured in the coming months to develop a framework that fosters continued regional dialogue on building sustainable water resources for both people and wildlife.	Metropolitan Thank you to the North and South Rivers Watershd Association for your comments and advocacy.