



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

**WATER CONSERVATION PLAN APPROVAL**

September 27, 2011

Community Action Program  
P.O. Box 1018  
Concord, NH 03302

RE: Concord – Newbury Housing for the Elderly  
Water Conservation Plan, September 8, 2011, NHDES # 999523

Dear Messrs:

On September 22, 2011, the New Hampshire Department of Environmental Services (“DES”) Drinking Water and Groundwater Bureau received a revised water conservation plan (the “Plan”), dated September 8, 2011, for Newbury Housing for the Elderly located in Newbury, NH. Pursuant to RSA 485:61 and Env-Wq 2101, community water systems seeking permits from DES for new sources of groundwater shall submit a water conservation plan to DES. Based on review of the Plan, DES has determined the Plan complies with Env-Wq 2101.04, *Requirements for New Community Water Systems*.

Pursuant to Env-Wq 2101.11, the Town of Newbury and the Upper Valley Lake Sunapee Regional Planning Commission (“UVLSRPC”) were provided the opportunity to comment on the Plan from August 5, 2011, the date of public notification, through August 26, 2011. On August 17, 2011, DES received comments from UVLSRPC. The comments were forwarded to Eckman Engineering, the agent for the project, and in response the Plan was revised to address the comments. On September 8, 2011, Eckman Engineering issued a letter to the Town of Newbury and UVLSRPC to notify them of the proposed changes. On September 22, 2011, DES received a revised Plan reflecting the changes.

This Water Conservation Plan Approval is conditioned upon the following:

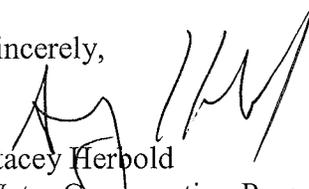
1. On **September 26, 2014**, and every three years thereafter, the water system shall submit a detailed and completed compliance report form to DES documenting compliance with the Plan. Required information includes contact information for the water-system owner and for the individual responsible for carrying out plan tasks; dates tasks were performed; and data relating to meter reading, water audits, leak detection, and public outreach. A copy of the *Water Conservation Plan Compliance Report Form* may be located at the DES website, [www.des.nh.gov](http://www.des.nh.gov), on the Water Conservation Program homepage.
2. Newbury Housing for the Elderly shall report to the DES Water Use Registration and Reporting Program. The Department has assigned WUID **20920** to **the water system**.

Following activation, monthly water use for each source shall be reported on a quarterly basis. Reporting forms will be mailed to you at the beginning of each quarter. If you have any questions about the Water Use Registration and Reporting please contact Derek Bennett at 271-6685 or [derek.bennett@des.nh.gov](mailto:derek.bennett@des.nh.gov).

3. Revisions to the Plan shall not be implemented without further approval from DES.

Please feel free to contact me with any questions at (603) 271-6989 or via e-mail at [stacey.herbold@des.nh.gov](mailto:stacey.herbold@des.nh.gov).

Sincerely,



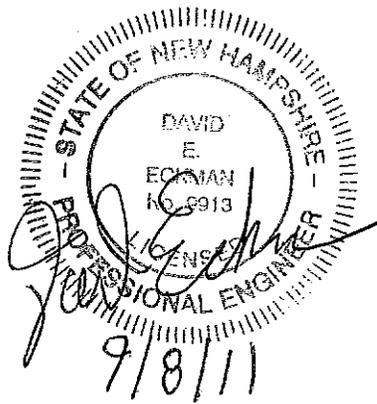
Stacey Herbold  
Water Conservation Program  
Drinking Water and Groundwater Bureau  
Department of Environmental Services

cc: Derek Bennett, NHDES  
Diana Morgan, NHDES  
Town of Newbury  
Christine Walker - UVLSRPC  
David Eckman, PE – Eckman Engineering  
Roger Appleton, PE – Eckman Engineering

**WATER CONSERVATION PLAN  
PROPOSED SMALL COMMUNITY WATER SYSTEM  
NEWBURY HOUSING FOR THE ELDERLY, INC.  
34-UNIT HUD 202 ELDERLY HOUSING  
NEWBURY, NH**

**MAY 20, 2011**

**REVISED SEPTEMBER 8, 2011**



**PREPARED BY:**



P.O. Box 3035  
Portsmouth, New Hampshire 03802

**PREPARED FOR:**

Community Action Program  
P.O. Box 1016  
Concord, New Hampshire 03302



May 20, 2011  
Revised July 18, 2011

Claire Vannatta/Judy Healey, Commissioner  
Upper Valley Lake Sunapee Regional Planning Commission  
10 Water Street, Suite 225  
Lebanon, NH 03766

Linda Plunkett, Town Clerk  
Town of Newbury  
P.O. Box 253  
937 Route 103  
Newbury, NH 03255

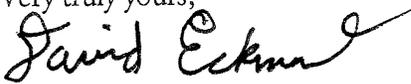
Re: Public Notification, Water Conservation Plan  
Newbury Housing for the Elderly, Inc. Community Water System  
Newbury Heights Road  
Newbury, NH

Dear Claire Vannatta/Judy Healey and Linda Plunkett,

Attached for your review and comment, please find the revised water conservation plan for Newbury Housing for the Elderly a proposed new small community water system of one-bedroom elderly housing units in Newbury, NH. This notice is in accordance with New Hampshire Department of Environmental Services (NHDES) Rule Env-Wq-2101.

The NHDES rule requires the owner perform this public notice and request that the Town of Newbury review and/or amend the town site plan requirements and individual site plan applications to reflect requirements of Env-Wq 2101 when applicable and to promote water conservation principles. The 2-page NHDES fact sheet included in Appendix B summarizes this rule. Per this rule the comment period is 21 days from your receipt of this information.

Please address comments to: Derek Bennett  
NHDES – Drinking Water and Groundwater Bureau  
P.O. Box 95  
Concord, NH 03302

Very truly yours,  
  
David E. Eckman, PE  
Principal Engineer

  
Roger Appleton, PE  
Project Engineer

CC: Derek Bennett, NHDES

Site Development.....Construction Services.....Bridge Design Services  
PORTSMOUTH, NH ■ 1950 Lafayette Road ■ Suite 301 ■ PO Box 3035 ■ Portsmouth ■ NH ■ 03802 ■ Office 603.433.1354 ■ Fax 603.433.2367

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**PURPOSE:**

This plan provides the information needed for small community water systems to meet the reporting requirements of Env-Wq 2101, Water Conservation Rules. Once completed, this plan can fulfill the requirements of Env-Wq 2101.10. A summary of the rule is attached and the rule is available at <http://des.nh.gov/organization/commissioner/legal/rules/documents/env-wq2101toc.pdf>

**1.0 - SYSTEM OVERVIEW**

The new proposed small community water system is proposed to support the construction of the Newbury Elderly Housing development, a HUD 202 development. The development will consist of 34 subsidized one-bedroom apartments, of approximately 580-600 sf each, contained in a single two story building with elevator, community room, laundry room, mail facility and office. The system will consist of one residential connection to service the single building development and one-irrigation connection with a separate service meter. The residential connection will also service two additional bathrooms adjacent to the community laundry room and community room respectively. The additional bathrooms will have negligible effect on the water system, as the use is limited to residents and their guests.

Newbury Elderly Housing is also the recipient of a HUD Project Rental Assistance Contract subsidy, under which tenant rents will not exceed 30% of gross income and include heat, hot water and electric service.

Additional uses for the community water system will have a negligible effect on the system and include connection to the closed loop geothermal heating system and a 5,000 gal sprinkler supply tank. The geothermal heating system will be a small diameter closed loop system that will be filled initially by the water system prior to occupation of the building by any tenants. The water system will also top of the geothermal system as required due to minor losses that are anticipated to be minimal. The geothermal system includes hollow tubes installed in the ground near the proposed building with two pipes inside each tube that the water flows through to naturally cool or heat the water for the system depending on the season.

The sprinkler supply tank will initially be filled using non-potable water from a tanker truck (fire department or pool water). The water system will be connected to the sprinkler supply tank's float valve and as needed will top off the tank to replace any water lost by evaporation or exfiltration. In the event of a fire, the Town Fire Department will have a hookup to the tank to recharge the tank if needed during the fire. Newbury Housing for the Elderly, Inc. will be responsible to refill the tank with non-potable water at any time after draw down.

### 1.1 - Project Contacts/ System Ownership

Project Contact: David Eckman, P.E. / Roger Appleton, P.E.  
Eckman Engineering  
1950 Lafayette Road, Unit 301  
P.O. Box 3035  
Portsmouth, NH 03802

Project Owner: Community Action Program (C.A.P.)  
P.O. Box 1018  
Concord, New Hampshire 03302

Person Responsible for completing the activities outlined in this plan:

Water conservation plan activities will be conducted by or supervised by the future certified water system operator.

Ownership:

At this time the water system is proposed to remain in the ownership of C.A.P.

### 1.2 – Water Use Trends

Since the Community Water System is proposed for an Elderly Housing Facility, water use data was obtained from similar facilities in the state of New Hampshire managed by C.A.P. for reference during the design process. The average daily use from 6 similar metered facilities was about 55 gallons per day per unit including irrigation, substantially less than the design demand for the system. There were no apparent seasonal trends in the water supply for any of the other facilities.

Since the water system is for a facility composed of a single building with a static number of units, water use and population trends are not expected to vary dramatically for the source. The hydraulic connection to local private and public wells of the low withdrawals anticipated will be indicated through the pump test, so that the potential impact of water use increase in the local area on the proposed system will also be indicated.

## **2.0 – PROPOSED METERING AND LEAK DETECTION:**

### **2.1 - New Small Community Water System**

This proposed new small community water system is planned to be composed of two drilled bedrock wells defined as bedrock well 1 and bedrock well 2. The capacity required is 11,100 gpd, which is needed to supply the 34-one bedroom units and irrigation of the small lawn areas surrounding the proposed Newbury Elderly Housing Building.

### **2.2 – Source Meters**

The system plans to install (3) three total source meters. There will be (1) one water meter installed for each well source and (1) one water meter on the pump house discharge main. The meters will be properly sized in accordance with American Water Works Association (AWWA) standards and specifications of the manufacturer. In selecting, installing and maintaining source meters, the water system will comply with procedures and protocols described in “Manual of Water Supply Practices, Water Meters-Selection, Installation, Testing, and Maintenance,” document identification number AWWA M6, available from the American Water Works Association, 1999 and applicable manufacturers specifications.

Source meters will be tested prior to installation and after installation shall be tested every one to five years, no less than every five years. Meters shall be considered acceptable if the accuracy is greater than or equal to 98.5% during normal flows and 95% during low flows. If the accuracy of the meters is below the acceptable level the meters shall be serviced or replaced. The meters will be read at least every 30 days and results recorded and maintained in a logbook.

### **2.3 – Service Meters**

The system plans to install (4) four total service meters. There will be (1) one service meter for the residential connection, (1) one service meter for the proposed irrigation system, (1) one service meter for the sprinkler supply tank connection and (1) one service meter for the geothermal heating system connection. The meters will be installed on the exterior of the proposed building near the entrance to the utility room. The meters will be properly sized in accordance with American Water Works Association (AWWA) standards and specifications of the manufacturer. In selecting, installing and maintaining service meters, the water system will comply with procedures and protocols described in “Manual of Water Supply Practices, Water Meters-Selection, Installation, Testing, and Maintenance,” document identification number AWWA M6, available from the American Water Works Association, 1999 and applicable manufacturers specifications.

Service meters will be tested prior to installation and after installation shall be tested every one to five years, no less than every five years. Meters shall be considered acceptable if the accuracy is greater than or equal to 98.5% during normal flows and 95% during low flows. If the accuracy of the meters is below the acceptable level the meters shall be serviced or replaced. The meters will be read at least every 90 days and results recorded and maintained in a logbook.

## 2.4 – Water Audit, Leak Detection and Unaccounted for Water

A log of water use is to be maintained, and the water system will implement a water audit program in accordance with “Manual of Water Supply Practices, Water Audits and Leak Detection”, document AWWA M36, American Water Works Association, 1999.

A water audit shall be conducted at least every year and at that time the percentage of unaccounted for water shall be calculated. If the percentage of unaccounted for water exceeds 15% of total water introduced to the system (well volume), the water system shall submit a response plan to NHDES within 60 days. This plan is to identify how the water system intends to reduce the percentage of unaccounted for water use below 15% within 2 years, except for detected leaks, which is to be repaired within 60 days. Upon NHDES approval the system is to implement the plan.

The water system shall institute a leak detection program in accordance with “Manual of Water Supply Practices, Water Audits and Leak Detection”, document AWWA M36, American Water Works Association, 1999. The leak detection surveys will be contracted out to a qualified leak detection contractor. Pipe location and type will be documented on as-built plans after the system is constructed and markers will be installed in the field at major angles to help field locate the pipe. The water system will be composed of approximately 1,000 lf of AWWA C-900 Polyvinyl Chloride (PVC) from the distribution system (pumphouse) to the proposed 34-unit building. There will be no zone meters installed on the system due to the relatively small size of the distribution network. Leak detection should be conducted for at least 50% of the system each year and 100% of the system if a significant leak is suspected based on the annual water audit.

In case of leak detection the water system will repair the leak within 60 days of discovery unless a waiver is obtained in accordance with Env-Wq 2101.09.

## 2.5 – Intentional Water Loss

The water system as proposed does not include any bleeders and the storage tanks are not intentionally allowed to overflow at this time. The wells are not drilled at this time so exact water quantity or quality is not known and final system design could potentially change based on water characteristics but at this time no intentional water loss is proposed. At this time the proposed system will not be a loop system.

## **3.0 – PROPOSED PRESSURE REDUCTION:**

To conserve water, the water system shall implement pressure reduction following approval for this new CWS when it is technically feasible, consistent with industry standards and regulations, and consistent with other public health and safety considerations. All pressure reduction measures to meet the requirements of Env-WS 372, Design Standards for Small Community Public Water Systems.

Upon installation and implementation of the water system, the operator shall develop a plan and timeframe to reduce pressures in zones in excess of 80 psi (when feasible). If pressure reduction is not feasible the operator shall increase the frequency of meter readings and water audits to determine leakage in that zone and repair any leaks in accordance with this plan and appropriate NHDES regulations.

**4.0 – PROPOSED CONSERVATION RATE STRUCTURE:**

The owner is planning to provide water only to tenants and irrigation for the building and will include water service as part of the rental fee's. Since the proposed service is a single building with only a one-bedroom/bathroom unit for each resident and two additional common bathrooms, significant variation between units/resident is not anticipated; therefore one service meter will be installed for all units, and the annual water equally divided between occupied units to establish the a flat monthly fee to be included as part of the monthly rental fee. Irrigation supply for the site will have a separate meter to monitor and control the irrigation use.

**5.0 – PROPOSED PUBLIC NOTIFICATION:**

A copy of this report via certified mail has been sent to the town of Newbury, NH and to the Upper Valley Lake Sunapee Regional Planning Commission along with a copy of a summary of the requirements of Env-Wq 2101. A cover letter was written to request that the Town of Newbury, NH review and/or amend the town site plan requirements and individual site plan applications so that it reflects the requirements of Env-Wq 2101 and promotes water conservation principals.

The names and addresses of those receiving public notification are on the cover page of this document. Copies of the cover letter sent to the governing boards and a copy of the certified mail receipts are enclosed. "Water Conservation at Home" educational outreach material was also mailed.

**6.0 – PROPOSED EDUCATIONAL OUTREACH INITIATIVES:**

Implemented immediately upon approval of the conservation plan, pertinent water efficiency fact sheets found at the NHDES website can be included with the yearly consumer confidence water system reports. A typical educational outreach fact sheet is attached. Activities outlined in the water conservation plan will be completed by water system personnel under the supervision of a certified water system operator.

The water system will submit a form supplied by DES once every three years documenting how compliance with the requirements of Env-Wq 2101 is being achieved.

# **APPENDICES**

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# **APPENDIX “A”**

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## **Certified Mail Receipts**

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Linda Plunkett, Town Clerk  
 Town of Newbury  
 P.O. BOX 253  
 937 ROUTE 103  
 Newbury, NH 03255

## 2. Article Number

(Transfer from service label)

7010 1670 0000 6839 0019

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

 Agent Addressee

## B. Received by (Printed Name)

DANIS WICK

## C. Date of Delivery

DEC 6 - 03

## D. Is delivery address different from item 1?

 YesIf YES, enter delivery address below:  No

## 3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

## 4. Restricted Delivery? (Extra Fee)

 Yes**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Claire Vannatta/Judy Healy  
 Upper Valley Lake Sunapee  
 Regional Planning Commission  
 10 Water St., Suite 225  
 Lebanon, NH 03766

## 2. Article Number

(Transfer from service label)

7010 1670 0000 6838 9228

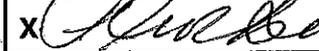
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

 Agent Addressee

## B. Received by (Printed Name)

PAT CROCKER

## C. Date of Delivery

9-12-11

## D. Is delivery address different from item 1?

 YesIf YES, enter delivery address below:  No

## 3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

## 4. Restricted Delivery? (Extra Fee)

 Yes

# **APPENDIX “B”**

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## **Env-Wq 2101 Water Conservation Rules Summary**

**-Water Conservation Rules-**  
**Env-Wq 2101 (formerly Env-Ws 390)**

Applicants applying for permits to develop new sources of water need to be aware that they are subject to new water conservation requirements required by [RSA 485.61](#) which became law in July 2002. The law requires that the Department of Environmental Services (Department) adopt and administer water conservation rules for applicants developing the following type of new water sources:

1. New sources of groundwater for community water systems subject to RSA 485:3;
2. New sources of groundwater for bottled and bulk water operations subject to RSA 485:3;
3. New sources of groundwater that exceed 57,600 gallons over any 24-hour period subject to RSA 485-C; and
4. New sources of surface water associated with projects that require a water quality certification pursuant to Section 401 of the Federal Clean Water Act.

The Department met with an advisory committee consisting of representatives of municipalities, community water systems, environmental organizations, and business and industry to develop the water conservation rules. The rules were formally adopted by the Department in May 2005.

A general summary of the requirements of the water conservation rules is provided below.

**Requirements for All Large Community Water Systems and All New Small  
Community Water Systems Developing New Sources of Water**

1. Install and maintain meters for all water withdrawals and service connections.
2. Implement a water audit, leak detection and leak repair program in accordance with the “Manual of Water Supply Practices, Water Audits and Leak Detection”, document identification number AWWA M36, American Water Works Association, 1999.
3. When applicable, development and implementation of response plans to reduce unaccounted for water to less than 15%.
4. Implement a rate structure that encourages efficient water use.
5. Implement a water conservation educational outreach initiative.

**Requirements for Existing Small Community Water Systems  
Developing New Sources of Water**

1. Either: a) Install source and service connection meters and implement a water audit, leak detection and leak repair program in accordance with the “Manual of Water Supply Practices, Water Audits and Leak Detection”, document identification number AWWA M36, American Water Works Association, 1999; **or** b) Complete a system-wide leak detection once every two years.
2. Repair all leaks within 60 days of identification.
3. Implement a water conservation educational outreach initiative.

**Requirements for Applicants Developing New Sources of Water for  
Industrial, Commercial, or Institutional Water Uses**

1. Install water meters for all water sources.
2. Retrofit or replace single pass water-cooling systems when feasible based upon an economic analysis that includes a four-year payback period.
3. Install controls to stop the overflow or discharge of water to waste when feasible based upon an economic analysis that includes a four-year payback period.
4. Identify water conservation best management practices or best available technologies that may be applicable to the types of water-using processes at the subject facility, and implement these measures when feasible based upon an economic analysis that includes a four-year payback period.
5. For all new lawn areas, install six (6) inches of loam and devices to shut-off automatic irrigation systems when not needed.

For more information about the water conservation rules, contact Derek Bennett at 271-6685 or [derek.bennett@des.nh.gov](mailto:derek.bennett@des.nh.gov).

# **APPENDIX “C”**

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## **Typical Educational Outreach Fact Sheet**

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# ENVIRONMENTAL Fact Sheet

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29 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • [www.des.nh.gov](http://www.des.nh.gov)

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WD-DWGB-26-17

2010

## Water Conservation at Home

The average adult needs only 2 ½ quarts of water per day to maintain health, but in New Hampshire, we each use 65 to 100 gallons per day for cooking, washing, flushing, and outdoor use. Our wasteful habits deplete clean water reserves faster than we can replenish them, pollute waterways, and stress aging drinking water and sewage treatment facilities beyond their capacities.

We waste water by practicing bad habits, such as leaving the water running when we brush our teeth, and by using inefficient water use devices. Installing new water-saving equipment and small devices can save significant amounts of water per household. Many devices are inexpensive, available in local hardware stores, and easy to install. They can also save on energy costs. By following a few simple steps, a typical family of four can save an astounding 50,000 to 100,000 gallons of water per year.

### **In the Homee**

- Look for the WaterSense label when considering water-using fixtures, appliances, and services. WaterSense, sponsored by the U.S. Environmental Protection Agency, labels water-efficient products that have been independently tested to ensure water savings without sacrificing performance or quality.
- Repair leaky faucets, indoors and out. One leaky faucet can waste up to 4,000 gallons of water per month and increase energy costs.
- Install faucet aerators. These inexpensive devices can reduce water use up to 60 percent, while maintaining a strong flow
- Clean vegetables in a large bowl of water instead of under the running tap.
- Compost food scraps rather than using a garbage disposal.
- When hand washing dishes, rinse dishes in a basin rather than under the tap.
- Run the dishwasher with a full load to save 15 gallons per load and hot water costs, too.
- When buying a new dishwasher, select one with a “light-wash” option. Newer models use 20 percent less water than older ones.
- Take short showers instead of baths. Showers use three times less water than a bath.
- Install a WaterSense-labeled low-flow showerhead. This will cut water use in the shower to just 2.0 gallons per minute and still provide an invigorating flow.
- Repair leaky toilets and flush handles stuck in the "on" position. Add 12 drops of food coloring to the tank. If color appears in the bowl one hour later, the unit is leaking.

- Avoid using automatic bowl cleaners in the toilet. These chemicals rapidly degrade flapper valves, causing toilets to leak.
- Install a toilet displacement device to save thousands of gallons of water per year. Place one to three weighted plastic jugs into the tank, making sure the jugs don't interfere with the flushing mechanism or a suitable flow. Or, instead of jugs, use toilet dams that hold back a reservoir of water during each flush. Don't use bricks because they can chip and foul the flushing mechanism.
- When buying a new toilet, select a WaterSense model that uses 1.28 gallons of water per flush, saving about 11,000 gallons per year per household.
- Shut off water when not in use, such as when you brush your teeth or shave.
- When purchasing a washing machine, buy a water-saving model. New models also save energy.
- For old and new washing machines, run full loads only.

### **Taking Water Conservation Outdoors**

- Set mower blades on a high setting (2" to 3") to provide natural ground shade and promote water retention by the soil.
- Water lawns and gardens early in the morning when evaporation is lowest.
- Use a rain gauge and water no more than 1 inch per week. Place several empty cans around the yard to determine how long it will take to apply 1 inch of water, then only run hoses or sprinklers for that time.
- Collect rainwater for watering plants using a rain barrel covered with a screen.
- Use rain sensors and soil moisture sensors on automatic sprinkler systems to prevent them from turning on when not needed.
- Use drip irrigation to water flower beds and non-lawn landscaped areas, or hand water these areas.
- Plant native species suited to your area. Ask your local nursery for plant and grass species that require less water.
- When washing your car, turn off the hose between rinses, or wash with a bucket and sponge and only use the hose for rinsing.
- Sweep down decks and driveways instead of hosing them down.

### **For Additional Information**

Please contact the Drinking Water and Groundwater Bureau at (603) 271-2513 or [dwgbinfo@des.nh.gov](mailto:dwgbinfo@des.nh.gov) or visit our website at

<http://des.nh.gov/organization/divisions/water/dwgb/index.htm>. All of the bureau's fact sheets are online at <http://des.nh.gov/organization/commissioner/pip/factsheets/dwgb/index.htm>. More information about the DES Water Conservation Program can be found at [http://des.nh.gov/organization/divisions/water/dwgb/water\\_conservation/index.htm](http://des.nh.gov/organization/divisions/water/dwgb/water_conservation/index.htm).