

March 31, 2012

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Executive Office of Energy and Environmental Affairs  
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Dear Ms. Baskin,

I am writing on behalf of Green Decade/Newton in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. Green Decade believes that appropriate application of the safe yield provisions of the Water Management Act would lead to more efficient water usage that could improve flow and water quality in stressed rivers, minimize sewer overflows, reduce greenhouse gas emissions, and save millions of dollars annually in water supply and wastewater treatment costs throughout the Commonwealth.

Green Decade appreciates the huge effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

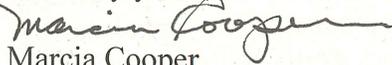
Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawals; and allows "non-essential" water use such as lawn irrigation when flows in nearby streams and rivers are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry. This is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Energy is required for pumping and heating water, and treating wastewater. Limiting water withdrawals to levels that are safe for fish would help curtail greenhouse gas emissions. State water policy should reflect the urgent need to conserve water as part of an overall effort to reduce greenhouse gas emissions.

Fortunately, conserving water helps contain the cost of water supply and wastewater treatment in the long run, so limiting water withdrawals to safe levels should be considered a self-funded mandate. Thank you for the opportunity to comment.

Sincerely yours,



Marcia Cooper  
President, Green Decade/Newton

**sustainable solutions for the 21st century**

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