



# TOWN OF IPSWICH

IPSWICH, MASSACHUSETTS 01938

TOWN HALL  
25 GREEN STREET

CONSERVATION COMMISSION  
CONSERVATION AGENT

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Re: SWMI Framework Comments

Dear Ms. Baskin:

The Ipswich Conservation Commission is writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. We appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. Because we are charged with the protection of wetlands and rivers in our town, we support proposals from the state that would protect one of the crown jewels in our town: the Ipswich River. As such, we support policies from the state that utilize scientific findings and development of ecologically-based streamflow criteria. Unfortunately, we have found weaknesses in the proposal that we believe would harm not only the Ipswich River, but other rivers in the Commonwealth.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Another goal of the proposed initiative should be to protecting the rivers that are healthy, and restoring those that are not.

*We find the proposal too simplistic given the diversity that Massachusetts has in its climate, geology, topography, vegetation. In addition, water supply sources in a given watershed have a great deal of variability in terms of whether they are surface or groundwater oriented and whether or not there is a supply system that has reservoir storage capacity. The SWMI Framework Summary does not explain EEA's assumptions about storage as part of the basic safe yield calculation. The capacity to store water cannot be assumed, because for many water supplies in the Commonwealth, such storage does not exist.*

By relying on USGS gage flows, the proposed SWMI framework is relying on data from impacted streams. In other words, yield rates are being developed from flow values that have already been subjected to withdrawals. This "double dipping" is not a method for developing sustainable yields.

While we appreciate the efforts that the Massachusetts EEA has taken to develop the SWMI framework, we do not find the proposal sufficient to keep the Ipswich River from running dry, particularly during the low flow/high water demand months of July, August, September and October.

The Ipswich Conservation Commission supports the position and recommendations of the Ipswich River Watershed Association in this matter.

Thank you for the opportunity to comment.

Sincerely,

David Standley, Chair, for the Ipswich Conservation Commission