



Save The Bay Center
100 Save The Bay Drive
Providence, RI 02905

P: 401-272-3540
F: 401-273-7153
SAVEBAY.ORG

April 4, 2012

Ms. Kathleen Baskin
Director of Water Policy
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th floor
Boston, MA 02114

Dear Ms. Baskin,

As a member of the Watershed Action Alliance (WAA), Save The Bay submits these comments on the proposed SWIMI regulations. Our organization is also a signatory to the comment letter submitted to your office by the Massachusetts Rivers Alliance. Save The Bay works to protect and restore the Narragansett Bay Watershed. The Commonwealth is home to over sixty percent of the Narragansett Bay Watershed. The Blackstone and Taunton River Watersheds are the largest sources of fresh water to the estuary, and include significant tributaries and important natural resources.

Save The Bay is one of many partners – local, state and federal – that have committed significant resources to restore historic anadromous fish runs, most notably for river herring (alewife), to Narragansett Bay tributaries including the Ten Mile River, Palmer River, Kickemuit River and Taunton River. A large fish ladder project is also currently in the works for the Rhode Island portion of the Blackstone River.

These collective efforts will be for naught unless river and stream flows are maintained at levels that allow alewife to access their spawning waters, and maintain river levels for their outmigration. River herring populations have been in precipitous decline in recent years, and we need to ensure adequate habitat for them in our rivers. It is imperative that the Commonwealth take all necessary measures to protect these waters by using sound science as a basis for regulating water withdrawals and discharges.

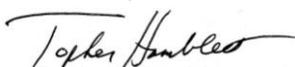
In this year of drought, Save The Bay is already observing the impacts of dangerously low stream flow conditions. Streams are at historic lows, which could spell disaster for this upcoming summer season. The Segregansett River on April 4 was flowing at 9.8 cfs, which is only 18% of its average flow for that date. This river is a known smelt spawning area, and flows are already at dangerously low levels.

Many of our area's stream gages are showing current flow levels at 20-30% of average flows. The Shad Factory Pond on the Palmer River in Rehoboth is used as a water supply and is currently at such a low level that water is barely flowing over the dam. At the Assawompsett Pond on the Nemasket River (the Taunton River Watershed's largest fish run), water often does not flow out of the pond, drying up the river below the dam.

These examples highlight the need for revised SWIMI regulations that are based in science and reflect a holistic approach to managing water withdrawals that will allow protection of the overall health of the system.

Thank you for considering Save The Bay's comments.

Sincerely,


Topher Hamblett
Director of Advocacy