

721 West Rd.
Westfield, MA 01085

April 9, 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,

I've heard that the public comment period for the Sustainable Water Management Initiative (SWMI) framework dated February 3, 2012 has been extended through today as a result of the Good Friday holiday, and hope that you'll consider my brief comments below. I am the Secretary of the Westfield River Watershed Association. Our group learned about the new regulations only last week, so have not taken a formal position on them. However, based on the comments we submitted in late 2010 on a draft version of the regulations, and the failure of the current framework to take those comments to heart, I believe I speak for the group when I point out that the "draft safe yield" proposed for the Westfield River (98.8 MGD) would regularly fail to provide adequate environmental protection for the river, and is totally unacceptable to our group. We understand that there are pressures for you to maximize the "safe yield" determinations, but we believe that the priority must be to ensure the biological and environmental integrity of the waters of the Commonwealth. Your "annualization" of the monthly Q_{90} flows in determining "safe yield" clearly throws that basic principle out the window. By allowing withdrawals based on the "annualized" values throughout the year, you will effectively allow the river to be drained dry during many low-flow periods in late summer or early fall.

We thank you for the opportunity to make comments, and hope that you will revise the "safe yield" determinations to more realistic values. Perhaps it is time for a third party to make more scientifically realistic assessments of "safe yield".

Sincerely,

A handwritten signature in black ink that reads "Michael A. Young". The signature is written in a cursive style with a large, looped 'Y' at the end.

Michael A. Young