
From: Ian Cooke [cooke@neponset.org]
Sent: Monday, October 20, 2014 3:02 PM
To: Baskin, Kathleen (EEA)
Cc: Rao, Vandana (EEA)
Subject: WRC Vote on Final WMA Regs

Dear Kathy,

Unfortunately, I will be unable attend tomorrow's WRC meeting during which the Commissioners will likely be voting on the final MassDEP WMA regulations to implement SWMI. Therefore, I would offer the following observations on behalf of the Neponset River Watershed Association, and ask that you convey them to the Commissioners.

As you know, I and my organization have invested considerable time and effort in the SWMI process over the last several years. In addition, two years ago, we completed a project (funded by a SWMI grant) wherein we worked closely with the WMA permittees of the Neponset Watershed which include all of our public water suppliers, to perform an in-depth evaluation of how the requirements of the SWMI Framework would have affected these communities and what strategies they might implement to comply.

My primary observation about the final WMA regulations and guidance, which are almost identical to the drafts released months ago and reviewed ad nauseam by all involved, is how very substantially they have been weakened from what was proposed in the SWMI Framework. While the implementation of what was proposed in the SWMI framework likely would have provided some help to the Neponset River, it seems extremely unlikely to me that the implementation of the final SWMI regulations will require any of our water suppliers to do much of anything, including almost all of the technically feasible and cost effective actions that we had identified through our SWMI grant described above. The final WMA regs will however provide some very modest seasonal benefit in the few Neponset towns who have not already adopted sensible non-essential outdoor water use policies.

Given how weak the proposed rules are, I can only interpret the overheated objections being raised against them by some groups as being either based on mis-information regarding how the regulations will work in practice, or as part of a concerted effort to forcefully oppose the institution of ANY new environmental protections into the WMA permitting process no matter how benign.

Given the level of effort that has gone into the SWMI process to date by the agencies, environmental advocates, and opponents alike, I urge the Commissioners to move forward with approving the final regulation package without any further delay, in hopes that doing so will hasten the advent of the next opportunity to develop a meaningful sustainable water management framework for the Commonwealth.

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