



October 20, 2014

Kathleen Baskin, Director of Water Policy  
Water Resources Commission  
100 Cambridge Street  
Suite 900  
Boston, MA 02114

**Re: Water Management Act regulations, amendments to 310 CMR 36.00**

Dear Ms. Baskin:

On behalf of the Massachusetts Rivers Alliance, Charles River Watershed Association and the Neponset River Watershed Association we are writing to urge the Water Resources Commission to vote on the proposed amendments to the Water Management Act regulations, 310 CMR 36.00, at its meeting tomorrow, October 21, 2014.

These draft regulations grew out of the multi-year Sustainable Water Management Initiative (SWMI) by the Executive Office of Energy and Environmental Affairs, MassDEP, Division of Fish and Game, and Department of Conservation and Recreation. The first meeting of the SWMI Advisory Committee was held in January, 2010. The inclusive SWMI stakeholder group included municipalities, public water suppliers, consultants and environmentalists. A technical subcommittee and various sub-groups also participated in this effort.

The WRC has received regular updates throughout this process. The draft regulations-- on which the WRC was thoroughly briefed-- contain minimal changes in their final form. An extensive public comment period was provided on the 2012 SWMI Framework and on the draft regulations and permit guidance this summer. We believe that delay now is unnecessary and unwarranted.

Our organizations believe that the regulations should be stronger and significantly more protective of our water resources. However, we can attest to the tremendous commitment of time and resources that the state and stakeholders have committed to SWMI. The science developed in the course of SWMI is sound and we urge the WRC to vote on the regulations on Tuesday as a first step toward protecting Massachusetts water resources for all of their uses.

Sincerely,

Julia Blatt, Massachusetts Rivers Alliance  
Margaret Van Deusen, Charles River Watershed Association  
Ian Cooke, Neponset River Watershed Association