

November 18, 2010

Anne Carroll, Acting Director  
Office of Water Resources  
Department of Conservation and Recreation  
251 Causeway Street, Suite 800  
Boston, MA 02114

Re: Sustainable Water Management Initiative Safe Yield and Streamflow Criteria

Dear Anne:

The Massachusetts Association of Conservation Commissions (MACC) is a nonprofit organization dedicated to educating and supporting conservation commissions and promoting protection of wetlands and other water resources in every city and town across the Commonwealth. We support your efforts to strengthen river and stream protection under the Water Management Act and other state laws and policies, and appreciate the opportunity to comment on the Sustainable Water Management Initiative's (SWMI) proposal to create new Safe Yield and streamflow criteria.

MACC has been observing the SWMI with interest because maintaining adequate water levels in rivers and streams is vital to protect adjoining wetland resources. Wetland ecosystems are critical to support fish and wildlife across the state: they reduce flood peaks by regulating the flow of water and retaining storm flows; protect the coast line by buffering the effects of waves and other storm effects; improve drinking water quality; trap sediment and heavy metals; and provide sensitive habitat for breeding and nesting. As such, all of the freshwater systems in Massachusetts need to be regulated cautiously using an integrated approach if we are to protect our most critical natural resources.

While Massachusetts has ample amounts of water, in some locations water resources are over-tapped resulting in environmental damage in rivers, streams and wetlands. MACC is concerned that despite efforts to consider the latest available scientific reports regarding the effects of streamflow depletion of fish (an indicator of impacts on all aquatic and semi-aquatic life), the Safe Yield methods proposed by the Executive Office of Energy and Environmental Affairs (EEA) fall short in two important respects:

Seasonality

MACC urges EEA to determine Safe Yield by examining water availability season-by-season and not by relying on an annual average. A seasonal approach will protect the state's most threatened rivers and streams from drought during warmer months and will allow our wetlands and other water resources to support balanced ecosystems. Specific streamflow criteria that are

regulated each season – based on water use and drought – will be able to more adequately sustain and support wetland bodies, fish and wildlife for future generations.

Location

MACC urges EEA to use existing, strong science and focus on the sub watershed or sub basin level, rather than 27 major watersheds when managing for water use. Withdrawal available in headwater or tributary basins cannot be properly calculated based on the entire major basin, since not all of that water is actually available at the point of withdrawal. Distinct watersheds should have their own Safe Yields to protect them from running dry.

Thank you for the opportunity to submit these comments. If you have questions, please contact me at [Linda.Orel@maccweb.org](mailto:Linda.Orel@maccweb.org) or 857-636-9673.

Sincerely,

Linda Orel  
Executive Director