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*Burlington Conservation Commission*

March 28, 2012

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

Re: SWMI Framework Comments

Dear Ms. Baskin:

I am writing on behalf of the Burlington Conservation Commission in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. Burlington lies in the headwaters of the Ipswich, Mystic (Aberjona) and Shawsheen watersheds, withdrawing water from the Shawsheen and its tributary, Vine Brook. As both a Conservation Administrator in Burlington and a member of the Ipswich River's Headwaters Stream Team, I see firsthand the impact of low-flow and no-flow conditions on headwaters streams caused by the combination of impervious watersheds and excessive groundwater withdrawals.

We appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, the weaknesses in the proposed Framework undermine its effectiveness and would make it impossible to achieve truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

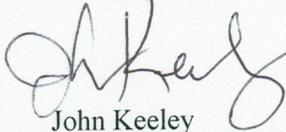
Currently, 292 sub-basins in Massachusetts – more than 20% – are seriously degraded by water withdrawals, and another 227 are losing fish and could fall into the degraded category if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from being pumped dry, which is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

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Thank you for the opportunity to comment.

Sincerely,



John Keeley

Burlington Conservation Administrator, of behalf of the Burlington Conservation Commission

Cc: Commissioner Kenneth Kimmell, MassDEP ([Kenneth.Kimmell@state.ma.us](mailto:Kenneth.Kimmell@state.ma.us))  
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