

From: Morris Schopf [mailto:schopf@verizon.net]
Sent: Friday, April 06, 2012 2:54 PM
To: Baskin, Kathleen (EEA)
Subject: Excessive estimates of "safe yield undermine the SWMI Framework

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)
Director of Water Policy and Planning
Executive Office of Environmental Affairs (EEA)
100 Cambridge Street
Boston, MA

Dear Ms. Baskin,

The rivers and streams which are vital to the wildlife and recreational opportunities for Massachusetts citizens are one of the great resources we are lucky to have in this State.

There are serious weaknesses in the proposed SWMI Framework which undermine its credibility, negate its effectiveness and thwart 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 are clean and flowing. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals.

The proposed safe yield methodology is unacceptable because it is inaccurate, intentionally excessive safe yield values undermine the entire SWMI Framework. The EEA methodology ignores the fact that less water than EEA "safe yield" is available in the summertime, which is also the period of highest water demand. Using EEA's own data and assumptions, if the safe yield were actually withdrawn continuously from our rivers, all Massachusetts rivers would be pumped dry during droughts, and most would be dry for half or more of the summertime. All Massachusetts rivers would be classified as Category 5: Severely Degraded

You have a once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. Let's start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for seeking comments on the work that has already been done. Please take full advantage of your opportunity to get it right and insure continued 12 month water flow in our rivers and streams.

Sincerely,
Morris Schopf
One Cambridge Street, Salem, Massachusetts