



Working with you to protect the environment in the Berkshires and beyond

March 23, 2010

United States Environmental Protection Agency Region 1
Attn: Thelma Murphy, Office of Ecosystem Protection
5 Post Office Square, Suite 100 – Mail Code: OEP06-4
Boston, MA 02109-3912

Subject: Comments on EPA's Draft General Permit for Small MS4s in the North Coastal Watersheds of Massachusetts.

Dear Ms. Murphy:

Berkshire Environmental Action Team, Inc. (BEAT) supports EPA's Draft General Permit for Small MS4s in the North Coastal Watersheds of Massachusetts, and we ask EPA to issue it within the year.

Berkshire Environmental Action Team, Inc. (BEAT) is a 501(c)3 non-profit environmental organization whose mission is to protect the environment in the Berkshires and beyond. As an action oriented environmental organization, we believe that an informed citizenry is the environment's best protection. BEAT reaches out to the community to help people understand our environmental assets and the laws designed to protect them.

Most of the water pollution in Massachusetts now comes from polluted rainwater runoff. Rainwater from roads, parking lots, and other impervious areas carry feces, gasoline, trash, and toxic chemicals through municipal storm drains directly into our rivers, streams, lakes, ponds, and wetlands. Millions of dollars have been spent removing PCBs from the Housatonic River. We must do better at keeping these other pollutants out of the river as well.

Municipal governments and agencies such as the Massachusetts Department of Transportation must do more to remove pollutants from rainwater runoff.

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1. Please require that large impervious surfaces (such as buildings, parking lots, driveways, streets, and highways) be disconnected from storm drains. These surfaces funnel huge quantities of polluted stormwater into storm drains which discharge to rivers, streams, lakes, ponds, and wetlands. All stormwater should be treated and infiltrated to seep by groundwater into our wetlands and waterways.
2. All new developments should be required to treat and infiltrate all runoff on site. No new connections should be allowed to any existing storm drain system. Existing storm drain systems should be disconnected from our wetlands and waterways, and the storm water should be treated and infiltrated.
3. Educate citizens, employees and businesses about the damage stormwater runoff does to local waterways and clearly communicate what they can do to help protect and restore water supplies, rivers, lakes, ponds and wetlands affected by storm water pollution.
4. Require that all stormwater reports and other information submitted by towns, state and federal agencies under this permit be posted on the EPA Region 1 website so that the information is available to citizens and watershed associations, and regulated communities and agencies can more easily learn from each other.
5. Set a specific target date for reducing to zero the volume of stormwater runoff allowed off site from existing municipal, state and federally-owned parking lots, roofs and other hard surfaces. All rainwater should be infiltrated to the ground, after treatment, to help replenish our drinking water supplies and sustain flows in rivers and streams and water levels in lakes, ponds and wetlands.
6. All new development should be required to reduce pollutants in 90% of the rainfall that falls in an average year, and infiltrate on site all rainwater that falls on the site.

In addition, EPA should do more to encourage towns to work with their own citizens, local watershed associations, and other nearby municipalities to find low-cost ways to better manage polluted runoff.

Thank you for considering our comments.

Sincerely,



Jane Winn