

May 30, 2019

Stormwater and Construction Permits Section  
Attention: Newton Tedder  
U.S Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP06-4

Re: Town of Swampscott Notice of Intent for Coverage Under the Small MS4 General Permit

Dear Mr. Tedder,

Please accept these comments on the Town of Swampscott Notice of Intent (NOI) on behalf of the Friends of Lynn & Nahant Beach, a non-profit environmental organization located in Lynn.

1. MCM 1: Public Education and Outreach
  - Educational materials should be placed online and they should be provided in other languages, including Spanish.
  - We request that additional activities be listed, such as:
    - Use of DPW electronic roadside signs to convey messages about stormwater.
    - Stenciling of storm drains, with a focus around the Stacey's Brook area.
2. MCM 2: Pubic Involvement and Participation
  - We commend the town for acknowledging the importance of trees for mitigating stormwater, but we would like them to consider a higher number of seedlings than the 20 planned. There are additional partners that may be interested in helping, including the Swampscott Conservation Commission and the Swampscott Conservancy, a recently formed environmental nonprofit organization.
  - We request that additional activities be listed, such as:
    - Cleanups of King's Beach.
    - Public review of SWMP and annual reports (located on website).
3. MCM 3: Illicit Discharge Detection and Elimination (IDDE)
  - Most or all of these activities would appear to be required by the consent decree between US EPA and the town. The measurable goals and the beginning year of implementation should reflect this. For those activities that do not fall within the consent decrees, the history of continual pollution at Kings Beach should require the strictest dates and goals possible.
  - There are two activities with a proposed beginning year of implementation of 2028. Given that is approximately 10 years from now, that appears to be in error.
4. MCM 6: Municipal Good Housekeeping and Pollution Prevention

- The rate of catch basin cleaning and street sweeping is insufficient. Catch basin pollution contributes to runoff into waterways, including the ongoing contamination onto Kings Beach. It is likely that some of the high levels of bacteria are due to dog waste being placed into catch basins. Litter is also commonly found along Humphrey Street in Swampscott in the Kings Beach area. Therefore, more frequent catch basin cleaning and street sweeping are essential.

Thank you for considering our comments.

Sincerely,

Robert Tucker, President  
Michael Celona, Vice President  
Friends of Lynn & Nahant Beach