

To: murphy.thelma@epamail.epa.gov

Date: March 29, 2010

Subject: Blackstone River Coalition Comments on EPA's Draft General Permit for Small MS4's in the North Coastal Watersheds of Massachusetts

Dear Ms Murphy,

The Blackstone River Coalition (BRC) strongly supports the Draft General Permit for Small MS4's in the North Coastal Watersheds of Massachusetts. While the BRC is most familiar with the Blackstone River, the same issues of too much phosphorous and not enough maintenance or resources plague our watershed as well.

Our six years of QAPP-approved citizen water quality data has helped to document the significant negative impacts that urban stormwater runoff imposes on important downstream water resources, stream biota and coastal marine habitat. We have seen the evidence of cultural eutrophication in the excessive algae growth and noxious weeds that are choking our local ponds.

Two of the easternmost towns of the Blackstone watershed, Mendon and Hopedale, have been included in this permit by virtue of having some land subject to the Charles River Total Mass Daily Loading requirements. We pledge to work with these two communities to help them meet their outreach and education requirements and we will encourage them to apply their proposed Phosphorous Control Plan town-wide, in expectation that a similar effort will be required in the Blackstone Watershed in the **VERY NEAR** future.

The US EPA is to be commended for striking the right balance of firmness and flexibility in crafting Round Two, Phase II Stormwater permitting. The draft permit is "tight about the ends and loose as to the means". The Permit provides clear guidance as to what objectives should be achieved but gives municipalities the flexibility to meet them. This is especially important given the great range of local capacity to implement an aggressive monitoring and maintenance plan for infrastructure, much of which was designed and installed more than 100 years ago.

Our primary concern is that smaller towns have neither the staff, funding nor capacity to develop customized public education for effective outreach which the permit requires for a range of different audiences: homeowners, businesses, Industry, construction, much less municipal workers. While the draft permit allows regional collaboration, the real need is for grant funding to encourage education at all levels to recognize and prevent stormwater pollution as a necessary first step, until market measures and best practices can be developed over time.

We urge the US EPA to issue the other three Massachusetts draft stormwater permits as soon as possible. Controlling the impacts of urban stormwater is critical if we are to achieve our nation's goal of clean water and our own local goal of a Fishable/Swimmable Blackstone River by 2015.

Sincerely,

Donna Williams, President
Blackstone River Coalition

Peter Coffin, Coordinator
Blackstone River Coalition