

Received  
3/30/10

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:

I am writing to convey my support for EPA's Draft General Permit for Small MS4s in the North Coastal Watersheds of Massachusetts and urge EPA to issue it within the year. I am a **Conservation Commissioner for the town of Georgetown** and feel a special concern in this area as a) the Conservation Commissions have a responsibility in controlling storm water runoff and b) this has often been a neglected area during developments.

Early in March, I was at the Pulte Homes development (at Parker River Landing) reviewing what must be done to satisfy the Order of Conditions for this development. To rectify an issue with overflow from one of the detention ponds at the development, the overflow was going to be piped directly into the Parker River. As this detention pond collects the storm water runoff from multiple building roofs and a large parking lot, the Agent and myself did not feel this was acceptable and added an additional detention pond on the development property and a rip-rap 'drywell' prior to the water entering the Parker River. Even with these added components, I believe we must actively monitor the system to ensure its effectiveness and take appropriate action if it appears storm water is flowing directly into the Parker River.

The bottom line is that storm water control is an area that must be emphasized at all levels of regulation, as it is an area that has suffered from neglect. Too often, storm water is ignored as a 'development issue' with the resulting pollution of our lakes and streams. An interesting observation is that generally it does not cost significantly more to 'do it right' as opposed to just 'doing it quick'. The additions mentioned above are a minor component of the 'punch-list' the developer has to complete this development and receive the required Certificate of Compliance from the Conservation Commission.

In particular, I strongly support provisions in the permit that require or encourage towns, state and federal agencies to:

- a. Sample water that is discharged from storm drains to rivers, streams, lakes, ponds and wetlands to determine if they contain pollutants.
- b. Disconnect large paved surfaces (such as buildings, parking lots, driveways and streets) from storm drains. These surfaces funnel huge quantities of polluted storm water into storm drains which discharge to rivers, streams, lakes, ponds, and wetlands.
- c. Adopt or amend municipal bylaws, ordinances or other local regulations requiring new developments of one or more acres to treat and infiltrate runoff, and