



HVA
PROTECTING YOUR BACKYARD

3/31/10

EPA - Region 1,
Attn: Thelma Murphy (murphy.thelma@epa.gov),
Office of Ecosystem Protection, 5 Post Office Square – Suite 100 – Mail Code: OEP06-4, Boston,
Massachusetts, 02109-3912.

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

Dear Ms. Murphy:

Representing the Housatonic Valley Association (HVA), a watershed organization on the Housatonic River in western Massachusetts, Connecticut, and eastern NY, I am writing to provide my strong support for EPA's Draft General Permit for Small MS4s in the North Coastal Watersheds of Massachusetts. HVA's mission is to defend the natural character and environmental health of our communities by protecting and restoring land and water throughout the Housatonic Watershed. We feel that this General Permit will help to correct a serious on-going problem, stormwater runoff, that is the prime contributor to the degradation of our nation's water resource.

We have been educating the Housatonic Watershed Communities for years on stormwater impacts to our watershed and see the definite need for stronger involvement by the EPA to regulate this impact. This General Permit for Small MSA4s is a major step in the right direction. We are therefore in agreement with many people and organizations throughout the Commonwealth with these major points in the Permit:

- The State of Massachusetts has some good stormwater management rules but, unfortunately, they apply only to stormwater discharges in or very near to wetlands and water bodies, and then only to new development and redevelopment. In an already densely developed state like ours, most stormwater goes untreated into municipal storm drains. That's why we strongly support EPA's proposals on:
 - elimination of illegal sewage or other contaminated discharges to storm sewers;
 - requirements that towns reduce polluted runoff from their own facilities such as streets, parking lots, parks and stormwater catch basins,
 - screening and sampling of stormwater discharges from outfalls, and
 - public education and involvement to minimize the polluted runoff from driveways, lawns and pets, and to maximize public support for municipal stormwater management.
- We strongly support proposed requirements to not only reduce pollutant levels in stormwater, but also to reduce the volume of stormwater runoff by recharging more of it to our underwater aquifers. Failure to adequately recharge stormwater is a major contributor to unnaturally low stream flows and water supply shortages.
- While we recognize that most municipalities face difficult financial circumstances at the present time, there are a number of things they can do to reduce or offset

the costs of complying with the General Permit. Financing mechanisms such as stormwater utilities (which set fees on development that adds new stormwater to municipal storm sewers) are available to help pay for stormwater management. In addition, adequate stormwater rules for new development and redevelopment, as well as elimination of illicit discharges, will lead to less polluted stormwater getting into municipal storm sewers, resulting in safer drinking water, safer swimming, fewer beach and shellfish bed closures, and reduced costs for municipalities. Educating the public about the dangers of polluted runoff is also essential to obtaining revenue for additional municipal expenditures on stormwater.

- The General Permit should do more to promote opportunities for municipalities to work together as well as with watershed groups and local citizens. In particular, many watershed groups have monitoring data collected under sampling protocols approved by MassDEP, that could be useful to MS4 owners. Many of them have considerable experience and expertise in monitoring and identification of illicit connections. MS4 owners can save money by working together on the things they would all be required to do under the proposed General Permit.

Thank you for the opportunity to comment on this proposed permit, and we hope that the EPA can implement these proposals.

Sincerely,

Dennis Regan
Berkshire Director

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