

March 27, 2010

Ms. Thelma Murphy, Office of Ecosystem Protection
U.S. EPA Region 1
5 Post Office Square, Suite 100, Mail Code OEP06-4
Boston, MA 02109-3912

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

Dear Ms. Murphy:

As a board member of the North & South Rivers Watershed Association I am writing to you to urge you to support EPA's Draft General for Small MS4s in the North Coastal Watersheds of Massachusetts.

The North and South Rivers Watershed have not met their water quality standards for years due to storm water runoff resulting in our shellfish beds being closed. The main source of our pollution comes from polluted rain water run off from paved surfaces such as parking lots and roads carrying gasoline, animal feces, trash and even toxic chemicals from lawns through storm drains directly into our rivers, wetlands, ponds, lakes and streams. These same pollutants can contaminate our drink water supply, beaches and shellfish beds.

I strongly support provisions in the permit to require, towns, state and federal agencies to:

- Find and get rid of pipes carrying human waste and toxic pollutants that have been illegally connected to town, state or federal storm drains designed only for rainwater.
- Sample water that is discharged from storm drains to rivers, streams, lakes, ponds and wetlands to determine if they contain pollutants.
- 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.
- Adopt or amend municipal bylaws, ordinances or other local regulations requiring new developments of one or more acres to treat and infiltrate runoff,

and reduce the amount of the pollutants in their runoff before it reaches the town storm sewers.

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- 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.

In addition, I strongly recommend that EPA strengthen the permit in the following ways:

- Require towns, state and federal agencies to immediately eliminate dangerous pollutants such as disease-causing bacteria and heavy metals from storm drain discharges near drinking water supply areas, swimming beaches, shellfish beds, schools, and natural areas containing state-listed rare plants and animals.
- Require that all storm water 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.
- Set a specific target for reducing the volume of storm water runoff generated by existing municipal, state and federally-owned parking lots, roofs and other hard surfaces. Increased infiltration of rainwater to the ground, after treatment, will help replenish our drinking water supplies and sustain flows in rivers and streams and water levels in lakes, ponds and wetlands.
- Require new developments of one or more acres to reduce pollutants in 90% of the rainfall that falls in an average year, not just 66%.

Also, I suggest that EPA encourage towns to partner more with their local watershed associations and nearby towns to find low-cost ways to better manage storm water pollution.

I understand that my watershed is outside of the area directly affected by the General Permit, I understand the EPQ will soon be proposing a similar permit for the rest of the state. I want EPA to know of my support.

Thank you for considering my comments.

Sincerely,

Craig C. Hannafin

PO Box 94

North Marshfield, MA 02059

Cc: Senator Scott Brown
Senator John Kerry
Rep. Bill Delahunt
State Senator Robert Hedlund
State Rep. Robert Nyman