IPSWICH RIVER WATERSHED ASSOCIATION
Connecting Communities from Source to Sea

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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 (including the Ipswich River Watershed), recommend a number of improvements, and urge EPA to issue it within the year.

According to state environmental officials, approximately 60% of the water pollution in Massachusetts comes from polluted rainwater. Rainwater from roads, parking lots, and other hard surfaces in the communities of the Ipswich River Watershed (all of which would be covered by this permit) carries pollutants through municipal storm drains into the Ipswich Rivers, streams, lakes, ponds, and wetlands. In fact, just yesterday I witnessed a significant stream of muddy water flowing down a steep roadway in Ipswich and discharging directly into the Ipswich River, just upstream of the town boat landing. I have also received three calls just this month from the Town of Ipswich reporting that wastewater is discharging into the river due to sewer system overflows during the recent storms.

Stormwater discharges pollute the Ipswich Rivers, streams, lakes ponds and coastal waters and can contaminate public water supplies, waters at swimming beaches, and shellfish beds. The discharges I mentioned above, which include pathogens, gasoline, oil, metals as well as other pollutants, occurred in the estuarine section of the watershed, where they will have deleterious impacts on the town's famous shellfish beds and beaches that are just a short distance downstream.

Towns and government agencies, including the Massachusetts Department of Transportation, must do more to remove pollutants from rainwater runoff, and prevent pollutants from accumulating on streets and other hard surfaces in the first place.

In particular, I strongly support provisions in the permit that require or encourage 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 stormwater 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.
- 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:

a. 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.

b. Require that all stormwater 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.

c. Set a specific target for reducing the volume of stormwater 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.

d. 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%.

In addition, EPA should do more to encourage towns to work with their own citizens, local watershed associations, and other nearby municipalities to find low-cost ways to better manage polluted runoff. We would also be interested in helping develop a watershed-wide stormwater sampling program, rather than having individual towns do this one-by-one.

Thank you very much for considering my comments on EPA's Draft General Permit for Small MS4s in the North Coastal Watersheds of Massachusetts.

Sincerely,

Kerry Mackie

Executive Director