



## Massachusetts Watershed Coalition

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March 30, 2010

U.S. 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

Re: EPA Draft General Permit for Small MS4s in North Coastal Watersheds

Dear Ms. Murphy:

The **Massachusetts Watershed Coalition** strongly supports EPA's Draft General Permit for Small MS4s. We deeply appreciate the careful attention and well-crafted provisions that will enable people to enjoy safe healthy waters.

Local solutions are the best approach to prevent and remedy stormwater problems that damage property, contaminate water supplies, harm aquatic life and spoil community uses of our water resources. The proposed MS4 General Permit will be an essential catalyst for better stormwater solutions. The General Permit will deliver critical guidance that communities need to avoid loss of their waters and to curtail the escalating costs for pollution abatement and water treatment.

Stormwater has cumulative impacts so it is more costly to fix problems later. The prudent local investment to comply with the proposed MS4 General Permit will prove a minute fraction of the environmental and economic costs from community failure to halt stormwater problems.

Most communities are unaware of the public health risks and harmful effects of runoff on stream life. Municipal officials and residents are also unfamiliar with federal and state policies that urge better site planning, low impact development and infiltration practices to cleanse and recharge the lethal first flush of storm runoff.

While communities do not know of these practices, there is vast public concern and popular support for pollution control. Previous community surveys by MWC were similar to the March 2009 Gallup Poll that shows water pollution is Americans' top environmental concern. The MS4 General Permit will assist communities to address this principal source of water pollution.

Stormwater is generated by the entire community and everyone can help to lessen this burden of pollution. We work with diverse municipal boards, homeowners, builders, businesses, schools and local groups, which share common interests in keeping water healthy. In partnering with communities, we have learned that people will help if they understand runoff problems and the many opportunities to prevent and remedy stormwater pollution. The provisions of the Draft MS4 General Permit will advance this practical guidance.

We agree that the General Permit supplies necessary and cost-effective provisions that will spur better solutions for stormwater runoff. We keenly support:

- Requirements that ensure discharges will comply with an approved TMDL and state water quality standards.

- Better public education and participation in municipal stormwater management programs. We urge posting of SWMPs and related information on the EPA New England website to assist use by community members. We suggest this information be linked to fact sheets for local officials, businesses, builders, community groups, homeowners and other target audiences on how they can remedy stormwater problems.
- Greater guidance and stipulations for the elimination of illicit discharges and SSOs. The provisions for detailed MS4 mapping and outfall sampling will assist communities to increase water quality benefits by assessing priorities for remediation.
- Ongoing requirements for post construction stormwater management. Local bylaws that incorporate the Massachusetts Stormwater Standards will foster more effective practices for new development and redevelopment. The process for adoption of ordinances/bylaws offers a key means to raise public awareness and community participation in stormwater management. The implementation of an ordinance/bylaw will continue to inform local officials, highway departments, builders and community groups about low impact design, green infrastructure and source reduction practices.
- We encourage partnerships among EPA New England and watershed organizations to extend community assistance with Directly Connected Impervious Area (DCIA), water monitoring and other General Permit provisions. Workshops for watershed organizations and municipal officials can furnish guidance such as EPA New England's *Stormwater TMDL Implementation Support Manual* (ENSR 2006), which will facilitate priority setting and local strategies to better manage polluted runoff.

Low impact development and the myriad opportunities for stormwater management must be nurtured at both the municipal and household levels. Many small infiltration practices can disconnect impervious cover and diminish runoff that impairs highly valued local waters. A wealth of information is available for outreach to homeowners, businesses, civic groups, schools, churches, builders and other audiences, which will motivate people to act when they understand how simple, inexpensive techniques can benefit their families and their neighborhoods.

We recommend that EPA place more emphasis on public participation. The General Permit supplies the ongoing impetus and guidance to remedy stormwater pollution. It is essential to build broad awareness and support by assisting municipal officials to involve local stormwater committees, "Green Committees", business organizations and other sectors of the community. EPA awards can promote and salute exemplary efforts by communities, businesses, developers, grassroots groups and individuals. This approach can reduce municipal costs for runoff control and help local officials to better achieve the aims of the Draft MS4 General Permit.

Thank you for considering our comments.

Sincerely,

*Bob Levite*

Robert A. Levite  
President

*Ed Himlan*

Edward Himlan  
Executive Director.