

TOWN OF HADLEY CONSERVATION COMMISSION

Feb 9, 2011

TO:Renahan.kate@EPA.gov
FROM: ALEXANDRA DAWSON, 2 WEST ST, HADLEY MA 01035
RE: DRAFT STORMWATER GP FOR MS4S

On March 29, 2010 I commented on the proposed GP for the north coastal basin. The proposed inland GP does not appear to be very different. Therefore I repeat only the most important of my previous comments. One of these comments relates to clarification; the other to improvement. In general I strongly support the new GP and congratulate EPA on its issuance.

As to clarification, I live in a small western MA town with a very active commercial strip. Most of the runoff goes to local streams, wetlands, and groundwater, but some goes into the "Municipal" street systems maintained by the town. For reasons unclear to the local conservation commission, no review of this municipal stormwater is permitted under the state wetlands protection act. The commission, and many other citizens, would welcome improvement of the municipal storm drains that drain into the Connecticut River and its tributaries; but we need to be sure that the definitions include a clear mandate because, frankly, the town will fight further review.

The comment on improvement relates to increases in drainage. As our old strip malls and big boxes are replaced or enlarged, they refuse to upgrade their discharges beyond the minimal improvements they consider reasonable. Can your regulations provide some useful standards?

Alexandra Dawson, Chair

CC Ann Lowery, DEP