

COMMENTS TO THE US ENVIRONMENTAL PROTECTION AGENCY
FROM THE CITY OF HOLYOKE, MASSACHUSETTS
JANUARY 20, 2011

The City of Holyoke is respectfully providing comments on the National Pollutant Discharge Elimination System (NPDES) Draft General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) in Massachusetts Interstate, Merrimack and South Coastal Watersheds, dated October 26, 2010. The City of Holyoke, Massachusetts has a population of approximately 40,400; consists of roughly 21 square miles; and is located on the Connecticut River, an American Heritage River. The storm drain infrastructure that is located within the Urbanized Area of Holyoke, and thus would be regulated by this Draft General Permit, consists of approximately 350,000 linear feet of pipe; 3,300 catch basins or manhole structures; and 75 outfalls.

The City of Holyoke has taken an active role to support the intent of the Clean Water Act. During the 2003 to 2008 permit cycle, the City has made steady, incremental progress toward achieving the goals of the NPDES program. The efforts of the City are reflected in the writing of a new city stormwater ordinance that requires both pre and post development sediment and erosion control methods and promotes environmentally sensitive site design that utilize Low Impact Development (LID) methods, the proactive prioritization of outfall inspection areas, and the many public education and public participation resources made available through our alliance with the Connecticut River Clean Up Committee, which is part of the Think Blue MA Team.

However, we believe that many of the draft permit requirements are either redundant with other regulations and/or are administratively excessive and will not provide a significant benefit to waters of the US. The City has estimated that these requirements would cost an additional \$980,000 over the five year permit cycle.

With the competing priorities of addressing failing infrastructure, eliminating CSOs, and keeping streets clean and snow-free, the City simply cannot afford to comply with requirements such as those described above. The 2011 Department of Public Works budget received cuts of over \$388,000 versus that requested for last year's budget. The City is committed to complying with

the Clean Water Act, but is requesting the following changes to this draft permit that we believe are more cost effective.

Section 2.4.4.5 Sanitary Sewer Overflows: The City of Holyoke is already prohibited from discharges that are Sanitary Sewer Overflows (SSOs) as part of their NPDES permit for their Combined Sewer Overflow (CSO) and Wastewater Treatment Plant. In addition, because the Draft MS4 permit prohibits illicit discharges, any SSOs discovered would be addressed through the Illicit Discharge program. A separate requirement in this permit for identification, elimination and reporting would be redundant.

The City of Holyoke recommends that Section 2.4.4.5 be removed from the General Permit Requirements.

2.4.4.6 System Mapping, 2.4.4.7 Outfall Mapping, and 2.4.4.8 (c) Assessment of Priority Catchments and Problem Catchments: The City of Holyoke has mapped all outfalls in GIS format and has developed a comprehensive IDDE program during the previous permit cycle. A requirement to develop a detailed map within a two-year time frame, separate and in addition to the other infrastructure needs of the City, is fiscally burdensome. The cost to the City for this requirement is estimated to be \$60,000. Cost effective updating of system mapping could be evaluated during infrastructure maintenance and upgrading, during outfall inspections, and when illicit discharges are detected necessitating investigation methods to determine the source.

Further work to delineate catchments for each and every outfall and determine their priority ranking is estimated to cost the city \$17,000. Investigating every line within the system will consume resources and, while development of detailed mapping is a useful exercise, this would be less fiscally burdensome if achieved on an incremental basis. The City could continue to develop mapping as outfalls are investigated. Identification of larger areas for priority ranking would be more cost effective. The City requests that more general language be used in the Permit, rather than requiring a detailed map within 2 years and delineation of catchments for each and every outfall.

The following sections, considered as a whole, will imposed a substantial administrative burden on the City and will impede the City's progress toward addressing illicit discharges and installing and upgrading BMPs:

2.4.6.7 Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management): This section requires cities and towns to develop a report on their current street and parking lot design policies and to evaluate how these policies affect the amount of impervious surface within the City.

2.4.6.8 Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management): This section requires cities and towns to develop a report on their current use of and policies affecting green infrastructure. The City of Holyoke has made substantial progress to incorporate LID methods by developing their Stormwater Authority Stormwater Regulations, dated May 17, 2010.

2.4.6.9 (c) and (d) Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management): These sections require municipalities to, within six months from the effective date of the permit, inventory all facilities and evaluate the potential to retrofit them with Best Management Practices designed to reduce the frequency, volume, and peak intensity of stormwater discharges.

The estimated cost for these three requirements is \$76,000. Rather than devoting this money to inventory, prioritize, and report on possible retrofits, it could be better spent on actually implementing LID or green infrastructure components on other more critical infrastructure projects that are scheduled to be completed. We believe a requirement to inventory all facilities will only add more administrative duties to staff and take away resources from implementing BMPs.

The City is committed to incorporating BMP retrofits into future upgrades to their facilities where feasible. The City Engineer and Public Works Superintendent review each City project to incorporate BMPs as required by the City's Stormwater Regulations and believe this process is more appropriate. The City would prefer to see language in the General Permit that requires a LID/Green Infrastructure evaluation be completed whenever a City Project is being considered, as is already required by the City's Stormwater Regulations.

2.4.7.1 (d)(iii) Operations and Maintenance (O&M) Programs: This section requires municipalities to develop an optimization plan for inspecting, cleaning, and repairing catch basins and then to implement the plan. At present the City inspects each of their 3,300 catch basins once during a five-year permit cycle. As drafted, the permit will require that each catch basin be inspected two times during the permit cycle. To double these efforts it is estimated that it will cost the City an additional \$69,375 in labor charges over the five year permit cycle. This estimate does not consider the additional equipment that would be needed or the maintenance on that equipment.

This section also requires that street sweeping frequency be changed from once per year to two times per year. An additional \$490,000 for labor and equipment charges over the permit cycle will be needed to fulfill this requirement.

Both of these measures will be exceedingly cost prohibitive to the City.

Once again, thank you for the opportunity to provide comments and for considering the City's concerns related to this proposed permit for stormwater discharges from small municipal separate storm sewer systems.