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1/18/11

Re: EPA's Draft General Permit for Small MS4s in the Interstate, Merrimack and South Coastal Watersheds of Massachusetts – (NPDES Permits MAR041000, MAR042000, and MAR04000I).

Dear Ms. Renahan:

Representing the Housatonic Valley Association, we are writing to express our strong support for EPA's Draft General Permit for Small MS4s in the Interstate, Merrimack and South Coastal Watersheds of Massachusetts. Due to the benefits derived from this permit for our watersheds, we hope that this permit system can be implemented as soon as possible. We are also writing to request two critical changes in the draft permit.

Since stormwater runoff is recognized as the primary source of pollution entering our waterways, we should be focusing on ways to minimize this impact. Stormwater discharges pollute not only our waterways, but can also contaminate public water supplies. We feel that towns as well as state and federal agencies must do more to remove pollutants from rainwater runoff, and prevent pollutants from accumulating on streets and other hard surfaces in the first place.

Therefore we support this proposed stormwater permit and in particular the provisions that require or encourage towns, state and federal agencies to:

- Find and get rid of pipes illegally connected to town, state or federal storm sewers designed only for rainwater. These illegal connections often contaminate stormwater with untreated human waste and toxic pollutants.
- Sample water that is discharged from storm sewer outfall pipes to rivers, streams, lakes, ponds and wetlands to determine the types, quantities and concentrations of pollutants they may contain.
- Treat stormwater so that discharges do not pollute waterways or further degrade already polluted waterways.
- Prevent pollution of stormwater by covering and properly managing potential sources of pollutant such as road salt, motor oil and exposed soil.



- 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 to treat and infiltrate runoff, and reduce the amount of the pollutants in their runoff before it reaches the town storm sewers.
- Educate residents, 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.

We would also like to request to the EPA to include certain amendments to the permit. In particular we would like to request:

- EPA should include performance standards based on Low Impact Development (LID) and Green Infrastructure stormwater management practices in the proposed General Permit. At a minimum, these performance standards should be included in the Post-Construction bylaw that the Draft General Permit requires municipalities to adopt or amend.
- The Draft General Permit should require towns, state and federal agencies to eliminate all existing stormwater discharges that have potential to contaminate public and private drinking water sources.

I would like to thank you for this opportunity to comment on this most important effort to reduce the impact from our most devastating waterway impact, stormwater runoff, an urge the implementation of this permit..

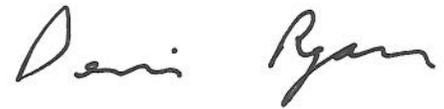
Sincerely,



Lynn Werner
Executive Director



Shep Evans
Director, Water Protection



Dennis Regan
Ma. Director