

Subject: Comments on 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:

I am writing to convey my support for EPA's Draft General Permit for Small MS4s in the Interstate, Merrimack and South Coastal Watersheds of Massachusetts and urge EPA and MA DEP to issue it within the year. I am also writing to request two critical changes in the draft permit.

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 my watershed carries animal waste, gasoline and oil, trash, copper and other metals, and toxic chemicals through municipal storm drains directly into our rivers, streams, lakes, ponds, wetlands and coastal waters. These discharges pollute our waterways and can contaminate public water supplies, waters at swimming beaches, and shellfish beds. 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.

In particular, I strongly support provisions in the draft General Permit that require or encourage towns, state and federal agencies to:

- a. 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.
- b. 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.

c. Treat stormwater so that discharges do not pollute waterways or
further
degrade already polluted waterways.

d. Prevent pollution of stormwater by covering and properly managing
potential
sources of pollutant such as road salt, motor oil and exposed soil.

e. 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.

f. 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.

g. 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.

In addition, EPA should change the draft permit in the following ways:

a. In response to apparent pressure from MA DEP, this proposed permit
weakens
an important permit provision included in the Draft General Permit for
the
North
Coastal Watersheds Massachusetts (2010). The North Coastal Draft
General
Permit
requires new development and redevelopment projects of "one or more
acres"
to
meet a number of DEP's Stormwater Standards, specifically #3-6 for new
development and #7 for re-development. By contrast, EPA's Draft

General
Permit
for the Interstate, Merrimack and South Coastal Watersheds requires
projects
that "result in two or more acres of impervious surface" to comply with
those
standards. The "one or more acres" threshold should be restored in the
Draft
General Permit. Towns are already required by EPA's existing 2003 MS4
permit to
issue stormwater permits to all development that disturbs more than an
acre, so
having them comply with a few basic DEP Stormwater Standards would not
be a
great burden.

b. 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.

c. The Draft General Permit should require towns, state and federal
agencies to
eliminate or relocate stormwater discharges that have reasonable
potential
to
contaminate reservoirs, lakes and ponds that are used as drinking water
sources.

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

Sincerely,

Kerry Mackin
Executive Director
Ipswich River Watershed Association

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