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March 11, 2011

United States Environmental Protection Agency Region 1
Kate Renahan Renahan.Kate@epa.gov, Office of Ecosystem Protection
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Boston, MA 02109-3912

Subject: Comments on EPA's Draft General Permit for Small MS4s in the South Coastal Watersheds of Massachusetts.

Dear Ms. Renahan:

I am writing on behalf of the North and South Rivers Watershed Association - a membership organization of over 2200 individuals located on the South Shore of Massachusetts- to convey our organization's support for EPA's Draft General Permit for Small MS4s in the South Coastal Watersheds of Massachusetts and urge EPA to issue it within the year.

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 dog poop, gasoline, trash, and even toxic chemicals through municipal storm drains directly into our rivers, streams, lakes, ponds, and wetlands. The North and South Rivers and many of its tributaries have NOT met their water quality standards for years due to storm water runoff resulting in our shellfish beds being closed.

These discharges pollute our rivers, streams, lakes ponds and coasts and can contaminate public water supplies, waters at swimming beaches, and shellfish beds. Towns and government agencies such as the Massachusetts Department of Transportation 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.



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- 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. At a minimum the “one or more acres” threshold should be restored in the Draft General Permit. However to be truly protective, *we believe the impervious threshold should apply to any significant amount of new or redeveloped impervious surface*, not twice as much impervious surface as land disturbed. We recommend that it apply to disturbance of one or more acres of land that results in *5,000 sq. ft. (about an eighth of an acre) or more impervious surface.*
- 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,

A handwritten signature in black ink that reads 'Samantha Woods'. The signature is written in a cursive, flowing style.

Samantha Woods
Executive Director

Cc: Senator Robert Hedlund
Senator Thomas Kennedy
Senator Michael Morrissey
Representative Thomas Calter
Representative Rhonda Nyman
Representative Daniel Webster
Representative Garrett Bradley
Representative James Cantwell
Congressman William Keating
Senator John Kerry
Senator Scott Brown

