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**BLACKSTONE HEADWATERS COALITION
COMMENTS REGARDING THE DRAFT STORMWATER PERMIT
FOR THE CITY OF WORCESTER**

STEERING COMMITTEE

Peggy Middaugh
*- Regional Environmental
Council*

Joan Crowell
*- Leesville Pond and
Neighborhood Association*

Lance McKee
*- Tatnuck Brook
Watershed Association*

Colin Novick
*- Greater Worcester Land
Trust*

Lincoln Pearson
*- Lake Quinsigamond
Watershed Association*

Donna Williams
- Mass Audubon

COORDINATOR

Peter Coffin

The Blackstone Headwaters Coalition strongly supports the recently proposed draft Stormwater permit for the City of Worcester. While The City has done a good job under their first permit, much more work and investment will be required to achieve the standards set forth in the Clean Water Act.

The City is to be commended for their past work: mapping and monitoring their outfalls, day-lighting a stretch of Beaver Brook and installing several sediment separators at several locations. We applaud the City for stating they will take a more aggressive approach to land disturbance; conduct more rigorous catch basin cleaning and have an accelerated schedule of street sweeping. We are concerned that the City wants to rest on their laurels and perhaps cut back on future funding for stormwater testing.

We do understand that the City should only be required to do that testing which is necessary and appropriate. If the City would rather conduct an aggressive illicit connection survey starting from the outfalls and working backwards up the pipe, instead of starting from the top; that should be acceptable.

While the permit sets out an aggressive monitoring plan, it should be noted that several tributaries in Worcester that are unassessed for impairments, i.e. Broad Meadow Brook, Coal Mine Brook and Poor Farm Brook should not be presumed to be meeting water quality standards. From our monthly testing, we are finding high levels of phosphates in many of the streams in Worcester.

The Blackstone Headwaters Coalition is hopeful that minor modification in the wording of the permit can reassure the City that they won't be open to frivolous lawsuits if water standards are not met on Day one of the permit, or even during the life of the permit as long as the City makes a good-faith effort to implement an effective Stormwater Management Plan.

The BHC is excited by the prospect of partnering with the City and other watershed advocates to educate homeowners and businesses how they can

help minimize stormwater impacts. Major successes have been made when working with committed local advocates such as Indian Lake, Coes Reservoir and Lake Quinsigamond. It is a lot harder to show much if any improvements to Mill Brook, Broad Meadow Brook, Poor Farm Brook, or the eutrophic Ponds such as Flint Pond, Curtis Pond, Leesville Pond or Green Hill Pond.

The BHC looks forward to working with The City, EPA, MA DEP and the citizens and businesses in Worcester as we all struggle together in the hard and important work of further cleaning Worcester's waters.

Sincerely,

Peter G. Coffin, Coordinator
Blackstone Headwaters Coalition

Cc: Robert Moylan, Worcester DPW
Michael O'Brien, Worcester City Manager
Glenn Haas, Mass DEP
Paul Hogan, Mass DEP
Stephen Perkins, US EPA