



Working with you to protect the environment in the Berkshires and beyond

January 21, 2011

United States Environmental Protection Agency Region 1
Attn: Kate Renahan
Office of the Regional Administrator
5 Post Office Square-Suite 100
Boston, MA 02109-3912

Subject: Comments on EPA's proposed NPDES General Permit for owners of Small Municipal Separate Storm Sewer Systems (MS4s) in the "Interstate, Merrimack and South Coastal Watersheds" of Massachusetts.

Dear Kate Renahan:

Berkshire Environmental Action Team, Inc. (BEAT) generally supports the proposed NPDES General Permit for owners of Small Municipal Separate Storm Sewer Systems (MS4s) in the "Interstate, Merrimack and South Coastal Watersheds" of Massachusetts, an area that encompasses more than 63 Massachusetts communities. In the Berkshires the communities of Pittsfield, Lanesborough, Dalton, and Lenox are included. BEAT asks EPA to issue this permit within the year.

Berkshire Environmental Action Team, Inc. (BEAT) is a 501(c)3 non-profit environmental organization whose mission is to protect the environment in the Berkshires and beyond. As an action oriented environmental organization, we believe that an informed citizenry is the environment's best protection. BEAT reaches out to the community to help people understand our environmental assets and the laws designed to protect them. Every year we hold river cleanups to involve volunteers in actually pulling trash and junk out of our rivers and streams.

Most of the water pollution in Massachusetts now comes from polluted rainwater runoff. Rainwater from roads, parking lots, and other impervious areas carry feces, gasoline, trash, and toxic chemicals through municipal storm drains directly into our rivers, streams, lakes, ponds, and wetlands. Hundreds of millions of dollars have been spent removing PCBs from the Housatonic River. We must do better at keeping these other pollutants out of the river as well.

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BEAT is very disappointed that the proposed permit is weaker than the permit for the North Coastal Watersheds. That permit required new development and redevelopment projects of “one or more acres” of impervious area to meet a number of DEP's Stormwater Standards. We feel that ALL development and redevelopment projects should meet these Standards. We strongly oppose weakening this permit by requiring only projects resulting in over two acres of impervious area instead of one acre to meet the Standards. We would have hoped EPA would move in the opposite direction.

Please require that large impervious surfaces (such as buildings, parking lots, driveways, streets, and highways) be disconnected from storm drains. These surfaces funnel huge quantities of polluted stormwater into storm drains which discharge to rivers, streams, lakes, ponds, and wetlands. All stormwater should be treated and infiltrated to seep by groundwater into our wetlands and waterways.

All new developments should be required to treat and infiltrate all runoff on site. No new connections should be allowed to any existing storm drain system. Existing storm drain systems should be disconnected from our wetlands and waterways, and the storm water should be treated and infiltrated.

Please require permit holders to educate citizens, 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.

Please require all stormwater reports and other information submitted by towns, state and federal agencies under this permit be posted on the EPA Region 1 website so that the information is available to citizens and watershed associations, and regulated communities and agencies can more easily learn from each other.

EPA should set a specific target date for reducing to zero the volume of stormwater runoff allowed off site from existing municipal, state and federally-owned parking lots, roofs and other hard surfaces. All rainwater should be infiltrated to the ground after treatment, to help replenish our drinking water supplies and sustain flows in rivers and streams and water levels in lakes, ponds and wetlands.

In addition, we ask EPA to do more to encourage towns to work with their own citizens, local watershed associations, and other nearby municipalities to find low-cost ways to better manage polluted runoff.

Thank you for considering our comments.

Sincerely,



Jane Winn