



ORAL TESTIMONY
EPA Draft Massachusetts MS4 General Permit
November 19, 2014

Good afternoon, my name is Alison Field-Juma, Executive Director of OARS, the watershed organization for the Assabet, Sudbury and Concord Rivers (Concord Basin). We have been running an EPA-certified quality assured water quality monitoring program for 22 years. Our organization is dedicated to restoring these three rivers to their Class B water quality—fishable and swimmable. Currently stormwater is a major source of impairment and the proposed MS4 permit will go a long way in enabling us and the communities in this 400-square mile watershed to meet this goal.

Stormwater has an unrelenting impact on our streams, ponds and rivers. Unless we take action now, this impact will only get worse with the increasing intensity of precipitation already being experienced and even more anticipated with climate disruption. Increasing intensity exacerbates runoff pollution and decreases infiltration of stormwater. The resulting loss of baseflow coupled with more frequent droughts and higher temperatures will stress our water bodies further. The draft MS4 permit is a critical tool to decrease stormwater contamination, recharge stormwater, improve infrastructure investment planning, and educate the public so that our surface waters continue to be major public assets. Reducing water pollution will benefit every resident of the state and is well worth the investment.

We are pleased that the EPA has developed a permit that will result in significantly reduce water pollution, while giving municipalities extra time and flexibility to make the needed investments. This is a long-term problem and long-term solutions take time and creativity to develop and put in place. But it is also an urgent problem and we ask EPA to work quickly in response to comments and complete a final permit at the earliest possible date.

Today I will highlight a few key requirements that the draft MS4 permit needs in order to be effective.

- 1) Illicit connections to storm drains are a serious problem. Requirements to prioritize, investigate and eliminate illicit connections will reduce dangerous pathogen levels and help restore designated uses such as swimming and boating. Right now we are struggling to deal with an illicit discharge into the Wild & Scenic section of the Assabet River.
- 2) All new development and redevelopment over an acre should infiltrate the first inch of runoff (the most polluted runoff), or provide an equal measure of pollutant reduction. This will ensure that ever more large developments use modern stormwater management techniques, whether new or on previously developed land. It is important that developments not be able to avoid this requirement by having fragmented parcels that fall under the threshold. This requirement will reduce the financial burden on towns by making private parties who use the public storm systems responsible for their discharges;
- 3) Towns discharging to water bodies with salt problems should minimize road and parking lot salt use to help improve habitat and restore fish diversity. We are glad that this important pollution problem will finally be addressed;
- 4) Where stormwater runoff causes or contributes to violations of state water quality standards extra measures should be taken to control individual pollutants (e.g., bacteria, nutrients, solids, salt, metals, oil and grease). This is an effective way to target the most serious water pollution problems in individual waterways;
- 5) Municipal public outreach campaigns should target businesses, institutions and industries—not just residents. These entities have a large role in pollution and need to change their behavior at least as much as residents;
- 6) Greater public access and opportunities to comment on towns' on-going efforts to comply with the MS4 permit is important to increase public support for increased municipal stormwater management and investment.

Thank you for proposing these significant improvements in the MS4 General Permit and for this opportunity to speak. We will be submitting more extensive written comments.