



Charles River Watershed Association

Guidelines for comment letters to EPA

Comment letters to EPA can be as short as a couple of sentences stating that you support cleaning up the Charles and support the proposed permit, or they can be detailed, technical suggestions for improving the permit. EPA typically uses the comments they receive to help make improvements to proposed permits, and also to understand the community interest in the issues.

EPA pays particular attention to comments by volunteers and residents who will be impacted by a new permit. CRWA strongly encourages our members and volunteers to write comments so EPA knows there are many people who believe that a clean river is a valuable economic and natural resource.

Tips for letter writing:

- Introduce yourself, including where you live and if you use the Charles for fishing, boating, etc.
- State clearly that you support the proposed new stormwater permit in the three upper Charles River towns of Milford, Bellingham and Franklin, and include the Docket ID No. EPA-R01-OW-2010-0292.
- Mention particular elements of the permit you think are important or especially critical (see CRWA's Background Information sheet at <http://www.crwa.org/projects/stormwater/RDA-background.pdf> and/or FAQs at http://www.crwa.org/projects/stormwater/swregs_q_and_a.html for some of the main issues in the permit).
- Identify anything you think needs to be strengthened, improved, or clarified. Make any specific suggestions you have to improve the permit or the overall stormwater regulatory program (some of CRWA's specific suggestions can be found on the next page).
- Close your letter with a final summary comment.

Thank you for your advocacy for a cleaner Charles!

EPA's Draft General Permit for Residually Designated Discharges in Milford, Bellingham, and Franklin, Massachusetts

Specific issues CRWA is providing comment on:

CRWA supports EPA's plan to start the new permit program with a pilot project in the three towns of Milford, Bellingham and Franklin, but we urge EPA to roll the permit out across the entire watershed as quickly as possible. Starting in the headwater towns makes sense because river clean-ups work best when done top to bottom; because the pollution and eutrophication problems first appear in those towns; and because EPA and the towns can create a successful program in an area of this size. However, the same stormwater controls are needed in the entire Charles, and all 35 cities and towns need private properties to be part of the clean-up. EPA should ensure that the pilot program is quickly extended to the entire watershed.

CRWA does not support the proposed exemption from this permit program of properties with large impervious surfaces if they are associated solely with sporting and recreational camps, recreational vehicle parks and campsites, or manufactured housing communities unless it can be demonstrated that no runoff from impervious surfaces at such facilities is discharged into a wetland or water resource either directly, or through a connection to a public or private drainage system.

CRWA supports the option of compliance through a "one inch certification" program. However, we believe more specific design detail should be provided to ensure that, if storage of the one inch storm is provided for later recharge or reuse, the storage facility shall be emptied and made available for storage of subsequent storms with 48 hours. Any water that is not recharged or reused from the storage facility within 48 hours must be managed on site.

CRWA supports the provision allowing property owners to comply with this new permit by participating in a Certified Municipal Phosphorus Program (CMPP). This will allow integrated and cost effective stormwater management and regional reductions in phosphorus pollution. However, significantly more guidance and support is needed for the successful creation of CMPPs to ensure that they are technically sound, adequately financed, and will achieve the requirements of the Charles River Nutrient TMDLs and Massachusetts water quality standards. Because the adoption of a CMPP by a town is strictly voluntary, CRWA urges EPA to play an active role, including bringing in outside expertise, to help towns evaluate this possibility.

CRWA strongly urges EPA to identify additional internal resources in the Region 1 office to support the roll out of this new permit, as well as to integrate this permit program with the Municipal Separate Storm Sewer System (MS4) permit program.