

July 31, 2008

David Gray
US EPA
One Congress St., Suite 1100 (CIP)
Boston, MA 02114

Re: Blackstone River Coalition comments on the Draft Stormwater Permit for the City of Worcester

Dear Mr. Gray,

The Blackstone River Coalition strongly supports the draft Stormwater Permit issued for the City of Worcester. Years of testing and numerous scientific reports: the Blackstone River Initiative in the 90's; MA DEP's on-going smart monitoring, recent efforts by U Mass/Amherst, CDM and the Upper Blackstone Water Pollution Abatement District; as well as the BRC's monthly volunteer testing; all document the problems of impaired water quality in Worcester's waterways.

One of the major findings of the BRI was the significant slug of pollutants coming into the river during wet weather events. All of this extensive and intensive testing documents the need to limit the impacts of stormwater washing off the hills and streets of Worcester, entering the storm sewer system and flowing directly, untreated into the nearest stream or pond.

The BRC is most concerned with the impacts of too much nutrients threatening the ability of the river system to provide habitat for diverse species of fish and wildlife. The excessive eutrophication of most of the ponds in Worcester is well documented. TMDL's have been issued for many ponds, but very little progress has been made in implementing recommended actions. The demise of the Blackstone Watershed team removed a key leadership element that could achieve results.

The timely issuance of Worcester's Stormwater Permit (it is already five years behind schedule) is critical to local efforts to achieve cleaner water. The complex and varied sources and control measure needed to address non-point sources of pollution requires the cooperation and partnership of private and public entities, homeowners and businesses, dog-walkers and car-drivers. Most importantly it needs leadership to achieve support from the various stakeholders.

The BRC looks forward to working in partnership with the City and others to implement the public education and other Best Management Practices that will be required under this permit. The

The Blackstone River Coalition

The Blackstone River
Coalition is a partnership
of numerous organizations,
businesses, municipalities,
agencies and individuals
working to restore the
Blackstone River and to
improve the health of the
Blackstone River watershed.



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Coalition has developed a four-pronged outreach effort regarding stormwater impacts. For residents, a “Homeowner’s Guide to Protecting Water Quality in the Blackstone River Watershed” offers guidance for home and lawn care. The “In Business for the Blackstone” program offers outreach and publicity for small businesses wanting to do their part. “The Blackstone Valley Guide to Low Impact Development Practices” encourages developers to find opportunities to minimize stormwater impacts, while guides for small farms and horse-owners cover the agricultural component of stormwater.

A truly effective stormwater program requires the willing participation of all stakeholders. The City as owner/operator of the MS4 system needs to take the lead, but the City needs the cooperation of citizens and regulators. It needs clear guidance from the regulators as to the goals, as well as the active participation of state and federal agencies in planning and implementing the various and sundry BMP’s that will be required.

Only by hard work and constant communication can this be achieved.

The BRC is excited by the prospect of all the stakeholders coming together for “the hard and important work of further cleaning Worcester’s waters.”

Sincerely,

Donna M. Williams, President

Peter G. Coffin, Coordinator

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