MODEL ORAL TESTIMONY FOR NOVEMBER 29, 2O14 PUBLIC HEARING
ON EPA's PROPOSED NEW MUNICIPAL SEPARATE STORM SEWER (MS4) GENERAL PERMIT

Good morning, my name is _____, from the [**NAME OF ORGANIZATION**]. [One sentence about where you are located, your mission, membership]. I am here to testify on the 2014 Draft MS4 Permit because of concerns we have for the environmental conditions of our local waterbodies and watershed. Stormwater causes or contributes to at least 55% of the violations of our water quality standards and there's been little progress lately to reduce this figure.

I would like to commend EPA for developing a permit that will result in significant reductions of water pollution, while giving municipalities extra time and flexibility to attain this result. While we understand communities are concerned about the cost of stormwater management, there are several ways towns can defray the cost of this investment; for example, by establishing stormwater utilities (similar to wastewater and drinking water utilities); by requiring that even small new commercial developments which use public storm drains minimize their own stormwater pollution; and working together with other towns and watershed associations to reduce costs. Reducing water pollution will benefit every citizen and is well worth the investment.

We urge EPA to work quickly in response to comments and complete a final permit at the earliest possible date. While we have many suggestions for clarification and improvement which we will be submitting in our written testimony, today we would like to point out the many ways in which the proposed new MS4 permit would lead to water quality improvement.

1) Requirements to prioritize, investigate and eliminate the very serious problem of <u>illicit connections</u> to storm drains (such as illegal tie-ins of sanitary sewer pipes) will reduce dangerous pathogen levels and restore designated uses such as swimming and boating;
2) The requirement that all <u>new development and redevelopment</u> over an acre infiltrate the first inch of runoff (which constitutes around 90% of annual rainfall), or provide an equal measure of pollutant reduction, is an achievable step which will ensure that large developments use modern stormwater management techniques. This step is crucial to reducing the financial burden on towns and making private parties who use the public storm systems responsible for their discharges;
3) Requirement that towns discharging to water bodies with sodium (salt) problems <u>minimize winter road and parking lot salt</u> use will help us improve habitat and restore fish diversity. This is an extremely important pollution problem that has never really been addressed before;
4) Requirements that <u>extra measures</u> be taken <u>to control individual pollutants</u> (including bacteria, excessive nutrients, solids, salt, metals and oil & grease) in stormwater runoff <u>that are causing or contributing to violations of state water quality standards</u> is a sensible way to direct efforts at the most serious water pollution problems in individual waterways;
5) Requirements for municipalities to begin a <u>public outreach</u> campaign targeting not just their residents, but also <u>commercial businesses, institutions and industries</u> will help all parties realize the role they can play in reducing stormwater pollution;
6) Requirements for MS4s to <u>annually assess the effectiveness of the BMPs they have implemented and consider alternatives</u> which might be more effective will lead to the most efficient allocation of resources;
7) Greater public access and opportunities to comment on towns' on-going efforts to comply with the MS4 permit will increase public support for increased municipal stormwater management.

We'd like to thank EPA for proposing these numerous improvements in the MS4 General Permit and urge you finalize them as quickly as possible. Thank you for this opportunity to speak. We will be submitting more extensive written comments by the December 29, 2014 comment deadline.