



9 January 2015 – **updated** again

Christopher Stone
Connecticut Department of Energy and Environmental Protection
Water Permitting and Enforcement Division
79 Elm Street, Hartford, Ct 06106

**re: Park Watershed Public Comment: Proposed 2014 Modifications to the MS4 Permits
General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer System**

Dear Mr. Stone,

I am writing with Park Watershed comments regarding the MS4 General Permit draft revision that has been prepared by Ct DEEP. As you know the current MS4, issued over a decade ago, is dated. Clearly revisions are complex, in part because municipalities have not prioritized planning principles that can conserve clean water. Because pollution from stormwater run-off is a primary cause of water quality impairment in the 78 square mile Park River regional watershed, we are very interested in this process, and the eventual outcome of your good work.

Can CT DEEP allow municipalities within a regional watershed an extra two years to develop a consensus regional watershed-based MS4 and/or stormwater manual? This suggestion was made during the December public hearing. There is a need to expand conversations that focus decision makers on specific problems within regional watersheds. Municipalities that opt into this approach voluntarily, will have an opportunity to develop regional MS4 permit requirements that improve their sub-watersheds. Area non-profit watershed stewardships organizations ought to be included in the collaborative process of detailing a regional watershed-based MS4 permit.

Park Watershed also recommends CT DEEP provide more guidance to municipalities regarding:

- Public Outreach and Educational Materials
- Public Involvement and Participation

Public Outreach and Educational Materials:

Municipalities should be required to annually post a map of their local sub watersheds within the context of its regional watershed. In addition, current water quality data, ought to be posted along with specific steps the municipality is taking to improve water quality. This information ought to be posted on municipal websites and in a print format that is distributed throughout its communities. Although there will be initial costs to prepare these maps, once the graphic files are developed, the maps can be easily updated from year to year. Municipalities spend plenty of public dollars on a variety of informational and event outreach materials, so it is reasonable to ask that funds be used to provide useful environmental information that is otherwise not easily available to citizens.

Public education material needs to provide specific quantitative and qualitative information about local water quality. Promotional summaries of projects managed by others, such as regional utilities, ought not replace factual data on all local streams. In other words, municipalities ought to be required to publish factual water quality information in plain language about every local stream, along with how municipal **planning** will improve local waters, and what citizens, homeowners, schools, churches and informal groups, such as scouts, can do to help. From my experience with Park Watershed, a citizen stewardship organization, the public knows very little about local water quality, and it is hard to find clear information, even though all municipalities have websites.



Park Watershed Public Comment: *Proposed 2014 Modifications to the MS4 Permits – continued*

Municipalities could work with regional watershed stewardship organizations working to develop a website through which citizens can post water quality data, and so document information, and their concerns on a “<http://seeclckfix.com/>” website for urban suburban watershed stewardship.

Public Involvement and Participation:

Park Watershed is supportive of increased monitoring, yet this requirement could be presented as an opportunity to include area non-profits and schools. The development of a community-based municipal monitoring program will help regional watershed communities collaborate on developing cost effective strategies for improving water quality and flood control. Water quality monitoring can help schools address state common core educational requirements. Municipal monitoring and educational programs are more important than leaf collection since data will give citizens knowledge needed to improve water quality through informed planning and maintenance decisions.

Municipal staff from Planning Economic Development and Public Works ought be required to attend a biannual regional watershed stewardship meeting that can include nonprofits, COG and CT DEEP staff. The purpose of this public meeting would be to coordinate stewardship between adjacent municipalities within the regional watersheds. A watershed stewardship meeting that includes and requires the participation of upstream and downstream municipal staff would focus decision-makers on the need to advance 21st century planning decisions. Currently conventional, 20th century development strategies do not adequately value conservation of healthy natural resources especially along riparian corridors. Biannual regional watershed meetings can lead to effective planning procedures that protect water quality. This process is related to the concept of a regional watershed specific MS4 permits, and/or stormwater manuals, which could incrementally raise the bar on the state guidelines by allowing communities dedicated to their clean water – often for recreational related economic benefits – to advance their policies and public involvement.

Let's face it is hard to improve water quality, and our taxes in Connecticut are high. Often for faulty economic reasons, municipal leaders support dated development practices that damage local water quality, and threaten downstream neighborhoods with increased flooding. Better communication about water quality problems is the most cost effective approach to change. Municipal leaders are simply not hearing public concerns about degraded natural resources - or simply do not know how to achieve ecosystem service benefits within a framework of increased economic development.

Environmental nonprofits are needed to assist in the process however we have neither the authority, nor the capacity - expect through expensive, reactive legal battles - to resolve the issues surrounding bad development decisions. In general, Park Watershed supports positions on the MS4 draft taken by Rivers Alliance of Ct and Ct Fund for the Environment, yet we hope for a more collaborative approach to raising awareness and resolving our very real, very local water quality problems.

Environmental nonprofits, like Park Watershed can be a collaborative partner with municipalities, water and sewer utilities, and CT DEEP. However, we need the state to bring us all to one table to work on integrated regional watershed strategies. Let's work together for 21st century progress.

With Respect,

Mary Rickel Pelletier