

Massachusetts Coalition for Water Resources Stewardship

Presentation to MWRA Advisory
Board

4/17/2008

Overview

- Who is the Massachusetts Coalition for Water Resources?
- What is their purpose?
- Why were they formed?
- Why your organization should consider joining?

Who is Massachusetts Coalition for Water Resources?

- It is a group of cities and towns and sewer authorities across Massachusetts who banded together about 6 months ago and who share a common concern in how EPA and DEP write and enforce NPDES permits
- Membership includes: City of Worcester, Springfield, New Bedford, Marlboro, Haverhill, Chicopee, Holyoke, Gloucester, South Essex Sanitary District, Upper Blackstone Water Pollution Abatement District, NACWA and others

What is their purpose?

- To speak with one voice concerning the flawed process used by EPA and DEP when issuing NPDES permits (CSO's, POTW's, Stormwater) and the costly unfunded mandates that follow
- To highlight the major failings of their current approach of permitting
- To restore the partnership that once existed between federal/state regulators and the regulated community

Why was it formed?

- **FRUSTRATION!!!!!!!**

- We have all been there. Dealing with EPA is a difficult and frustrating experience because they operate from a different basis than us
- They don't have to face ratepayers
- They are not concerned with
 - Affordability
 - Cost benefit
 - Science on which they premise their permits
 - Holistic approach to watershed management

Why you should consider joining

- There is no organization in Massachusetts now that represents the concerns of cities, towns and sewer authorities
- As our MCWRS grows, so does its impact and influence at both the state and federal level
- Our influence will offset some influence of environmental advocacy groups and may foster a return to the days of reasonableness and partnership

Actual Examples of the Regulatory Excess that Exists

- UBWPAD (POTW)
- Springfield (CSO)
- Worcester (Stormwater)
- New Bedford (CSO)

What has MCWRS done about EPA's current approach?

- Produced “White Paper” with 10 recommendations for change
- Had the full delegation at the federal level request a meeting in Washington with Region 1 EPA to discuss the recommendations of the “White Paper”
- Will be part of a committee that will meet with EPA over next 6 months to improve current process and then report back to federal delegation.

White Paper recommendations

- Open dialogue with regulators and stakeholders
- Coordinated permitting by watershed
- Longer permit terms
- Costs must be considered
 - Cost/benefit
 - Grant funding
- Better science in decision making based on holistic watershed approach

Recommendations (cont.)

- Focus on biggest problems first
- Numerical limits based on valid science and pragmatic watershed needs
- Realistic expectations
- Creative permitting
- Commonwealth to assume primacy