Municipal Perspectives on the Draft MS4 Permit

Agenda

The Permit Themes
The Municipal Perspective
The Cost
The Reality
SERSG - SEMSWC
The Permit Themes

- Waterbody Based
- Professional
- Proactive
- Partner
- Protective
The Municipal Perspective

- Waterbody Based
- Professional
- Proactive
- Partner
- Protective

- Complicated
- Prescriptive
- Assertive schedule
- Nice in theory, but...
- At what cost?

“Unfunded Mandate”
Waterbody Based - Complicated
Every community has different requirements

- MA TMDL Bacteria
- MA TMDL Phosphorus (3)
- MA TMDL Nitrogen
- RI TMDL Bacteria
- NY TMDL Nitrogen
- RI TMDL Metals
- RI TMDL Phosphorus
- MA Impaired Bacteria
- MA Impaired Chloride
- MA Impaired Nitrogen
- MA Impaired Phosphorus
- MA Impaired Oil, Grease, Solids, Metals
## Professional - Prescriptive

<table>
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<tr>
<th>Activity</th>
<th>MA TMDL</th>
<th>RI TMDL</th>
<th>NY TMDL</th>
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<th>RI Impaired</th>
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</table>

1: MCM1x2 + MCM3/IDDE=High
2: MCM1x3
3: MCM5 + MCM6
4: Source Identification Report + IC + DCIA + BMP
5: Salt Reduction Plan + Ordinance + MCM1 + MCM5
6: Charles River PCP, Lakes & Ponds PCP
Proactive Assertive Program Schedule

- **Urban Charles River**
- **Urban Suburban**
- **Suburban No Sewer**

Program and investigation only
Not including system repairs

Effort & Resources

Year 1  Year 2  Year 3  Year 4  Year 5

Staffing? Assistance? Time? Funds?
Partnering is historically difficult
Protective – At What Cost?
Annual Additional M$4 Compliance Costs

- Urban Charles River: $250,000
- Urban Suburban: $180,000
- Suburban No Sewer: $90,000

Program and investigation only
Not including system repairs
### Protective – At What Cost

**Annual Additional M$4 Compliance Costs**

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Program and investigation only
Not including system repairs
The Cost
Total M$4 Costs

Structural BMPs
$3,000 to $54,000 per pound of removed phosphorus
(EPA Fact Sheet)

Charles River
Pounds to Remove
Median 600
Average 860
The Cost
Total M$4 Program Costs

$85 million to $195 million
Best Case Scenario
Phosphorus Control
Construction Costs
(EPA Fact Sheet)

Bellingham
$4,800,000

Milford
$5,600,000

Franklin
$9,800,000

From: Sustainable Stormwater Funding in the Upper Charles River Communities of Bellingham, Franklin, and Milford (HWG/AMEC) 2011
The Reality

- The MS4 permit is coming
  - It is a complex compilation of semi-individual permits
  - It will take time and resources to set up

- It is time to
  - Get your constituents on board
  - Examine funding strategies
  - Appropriate funds for FY16 to understand your future budget
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Thank You

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