



Robert Perciasepe, Acting Administrator  
U.S. EPA Headquarters, Ariel Rios Building  
1200 Pennsylvania Ave. NW  
Mail Code: 1101A  
Washington, DC 20460

April 19, 2013

**Re: Environmental Protection Agency's Proposed Rulemaking to Address Stormwater Management**

Dear Acting Administrator Perciasepe:

We write to express our commitment to protecting and improving our communities' waters through effective stormwater management. As mayors and local government officials working to meet clean water goals, we understand that stormwater runoff is a problem that must be addressed comprehensively and through cost-effective solutions. The outcome of the current stormwater regulation reform has the potential to help communities like ours better address a major and still-growing source of water pollution and flooding while also placing significant demands on local government resources. To garner clean water benefits without overburdening local resources, local governments support innovative and sustainable practices such as green infrastructure in the context of stormwater rulemaking.

We have learned first-hand that the traditional approaches to managing runoff have not been successful at eliminating flooding or improving water quality in our communities. Many of our communities have already demonstrated that green infrastructure approaches offer affordable, effective solutions to water pollution and flooding, and create multiple benefits, including more livable neighborhoods, increased property values, more green jobs, and reduced energy costs.

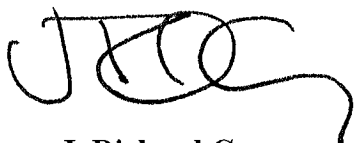
While there are many complex components of these proposed stormwater regulations, the Local Government Advisory Committee of the Chesapeake Bay Program specifically endorses increased support for green infrastructure approaches that reduce runoff and manage stormwater on-site. EPA's upcoming stormwater rule must include clear, achievable, and flexible standards and provisions that encourage the adoption and use of green infrastructure practices and help advance a broader green infrastructure strategy, combining regulatory and non-regulatory tools such as financial, technical, education and training, and research-related assistance.

Specifically, we urge the EPA to:

- ✓ Develop regulations based on the use of green infrastructure as an effective and feasible means of reducing stormwater pollution and sewer overflows;
- ✓ Fully account for the economic and environmental benefits realized from the use of green infrastructure;
- ✓ Focus increased federal funding for green infrastructure initiatives at the local level;
- ✓ Provide educational, technical, and training resources to assist municipalities in developing green infrastructure initiatives as part of CSO, SSO, and MS4 programs;
- ✓ Develop model provisions to incorporate green infrastructure into permits and other enforcement vehicles;
- ✓ Coordinate policies and practices among EPA programs and offices, and other federal and state programs to reduce barriers to green infrastructure project implementation;
- ✓ Embrace innovative green infrastructure strategies and practices through the use of compliance assistance and enforcement policies and mechanisms that reduce risks to permit holders and practitioners; and
- ✓ Encourage dischargers of stormwater to reduce pollution, particularly through green infrastructure practices in areas of new growth and urban redevelopment.

We believe this rulemaking process represents an important opportunity to advance clean water strategies in our jurisdictions through establishment of objective minimum baselines for stormwater management, guidance to ensure that the burdens of compliance are equitably shared, and the flexibility to fully utilize green infrastructure to reduce long term costs. We look forward to a smart, modern set of stormwater rules that reduce pollution, improve regulatory fairness, and promote healthier, greener communities.

Sincerely,



**J. Richard Gray**

Mayor of Lancaster, PA

Chair, Local Government Advisory Committee