



CUMBERLAND COUNTY  
**SOIL & WATER**  
CONSERVATION DISTRICT

LEADERS IN NATURAL RESOURCE CONSERVATION

February 27, 2025

*Re: Neither For nor Against LD 646: "Resolve, Establishing the Commission to Study Unregulated Storm Water Pollution"*

Dear Environment and Natural Resources Committee Members,

My name is Ali Cliff and I am the Education & Outreach Coordinator with the Cumberland County Soil & Water Conservation District (District). The District is a leader in stormwater management and water protection here in Maine. We work passionately to protect our local waterbodies and ensure clean water and healthy soils in our community.

Maine's stormwater program needs additional state-level support and resources, however, we find this bill vague and incomplete. The bill does not propose a realistic plan for researching stormwater issues across the State, and we are not confident in the outlined study commission as it fails to consider critical known needs and ongoing stormwater practices, regulations, and partnerships already working in Maine.

As written:

- **The bill fails to define the term "unregulated"**. Since there are many federal, state, and municipal regulations for stormwater in Maine, this oversight is concerning. Will this study commission focus on investigating new or stricter regulations to place on municipalities, development, and businesses? Will this study commission focus on investigating emerging environmental pollutants that can be carried by stormwater? The bill must have clear definitions, scope, tasks, and objectives to potentially benefit Maine's stormwater program.
- **The bill fails to include enough representation from municipalities and state departments implementing stormwater programs throughout the state.** This critical input from current stormwater experts will be needed for a stormwater study commission to be successful. Otherwise, it will likely be a waste of taxpayer money and commission member staff time.
- **There are many known stormwater issues and appropriate solutions that need to be addressed.** Will this study commission focus on fixing known state-level stormwater staffing, funding, regulation, enforcement, and data collection gaps? How can Maine's stormwater program grow and improve when it isn't on a solid foundation at the state level?
- **Determining appropriate and responsible study commission recommendations involves using data collected over several years following strict procedures.** Will the study commission be able to identify or create enough sources of funding to provide proper sampling procedures, trained staff, costly monitoring equipment and laboratory testing, and other expenses needed to provide this state-level research for years to come?

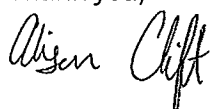
We ask these questions because the District is already deeply involved in working on these issues. With a state mandate and very limited funding, we successfully manage various stormwater projects throughout the state:



- **We have delegated authority from DEP** for development plan review (plans with Stormwater Management Law and Site Location of Development Act applications). Our technical staff are also able to provide third-party inspection services for construction, erosion and sediment control, post-construction best management practices, and Chapter 500 stormwater site law for DEP and municipalities.
- **We provide on-going technical, operational, and educational support to the Long Creek Watershed Management District.** The Long Creek Restoration Project began in 2007 as a collaborative, community-based initiative with representatives from the District, four Long Creek watershed municipalities (Portland, Scarborough, South Portland, and Westbrook), local businesses, and state agencies working together to solve water quality issues. The Long Creek Watershed Management District implements stormwater infrastructure and stream restoration projects to improve the health of Long Creek.
- **We host the northeast's premier stormwater industry event: the biennial Maine Stormwater Conference,** which brings together professionals from the Northeast region and fosters connections between technology companies, planners, infrastructure designers, builders, engineers, and state and municipal leaders.
- **We run the Think Blue Maine campaign,** which aims to educate the public on stormwater issues, best practices, and pollution prevention through community events, workshops, social media, and online resources. During the LePage administration, DEP was forced to forfeit the state's stormwater education program, Think Blue Maine. DEP sent the Think Blue Maine program to the District to implement on behalf of the state and the stormwater permittees with no funding or staffing support.
- **We facilitate the Interlocal Stormwater Working Group,** a collaboration between the District, 14 municipalities, and 2 small MS4s in the greater Portland and Saco areas and our partners to identify and address water quality issues in the Casco Bay and Saco Bay watersheds.
- **We develop and implement numerous watershed nonpoint source surveys, protection, and management plans.** These federally funded grants focus on reducing numerous stormwater pollutants through best management practices around lakes, ponds, streams, and rivers.
- **Education has been at the heart of our mission for over 75 years.** Our youth education program focuses on local natural resource conservation, including the connection between stormwater and the health of our lakes, streams, and oceans.

There is still much to do to improve statewide stormwater efforts. We welcome any questions you may have.

Thank you,



Ali Clift, Education & Outreach Coordinator

