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March 30, 2010

EPA-Region 1
Attn: Thelma Murphy
Office of Ecosystem Protection
5 Post Office Square - Suite 100
Boston, Massachusetts, 02109-3912.

Re: Draft Massachusetts North Coastal Small MS4 General Permit

Dear Ms. Murphy:

Thank you for the opportunity to comment on the Draft Massachusetts North Coastal Small MS4 General Permit. I commend the efforts of the Environmental Protection Agency to protect water quality in the Commonwealth of Massachusetts. I write as a municipal official concerned about the demands that will be placed on myself and other department personnel as the parties responsible for implementing the permit requirements and also on behalf of the residents who ultimately bear the burden of funding implementation of the permit requirements.

As the Director of Community Development in the Town of Belmont I am responsible for all major repairs and upgrades to the sanitary sewer and storm drain system. I work closely with the Director of the Department of Public Works who is responsible for the maintenance work required by the permit. We have limited financial and staffing resources at our disposal. Implementing the requirements of the permit will be impossible without adding staff to oversee the responsibilities. At a time when most communities are struggling to close budget deficits the Town of Belmont finds it particularly difficult given that the town is approximately ninety-five percent residential with no significant commercial or industrial tax base to offset the residential property tax rates.

Implementing the Massachusetts North Coastal Small MS4 General Permit will put a tremendous burden on the town and will likely leave us without a good means to properly oversee implementation of the permit. Relying on a tax override to help bring in additional personnel is a risky proposition as there is no guarantee of a positive outcome. The alternative of eliminating other staff is not reasonable as everyone

is operating at minimum staffing levels right now. Therefore, I have real concerns about the Town of Belmont's ability to provide the necessary technical and administrative staff required to implement the permit. It is my belief that funding assistance to local municipalities like Belmont from the state or federal level will be required to properly implement the Massachusetts North Coastal Small MS4 General Permit.

Thank you again for the opportunity to comment.

Respectfully,



Glenn R. Clancy, P.E.
Director
Town Engineer

Cc: Thomas G. Younger, Town Administrator
Peter J. Castanino, Director, Department of Public Works