



MILFORD BOARD OF SELECTMEN

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Received
3/8/10

March 1, 2010

U.S. EPA, Region 1
5 Post Office Square, Suite 100
Mail Code – OEP06-4
Boston, MA 02109-3912
Att: Ms. Thelma Murphy

RE: Draft General Permits for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems in Massachusetts North Coastal Watersheds.

Dear Ms. Murphy:

The Town of Milford has worked diligently to be in compliance with the NPDES General Permit Program for stormwater discharges from Small MS4s since 2003 when the permit was first issued. In Milford it is the responsibility of the Highway Surveyor and Town Engineer without the benefit of any supporting staff to manage and administer the program. This required the Town to engage the assistance of an environmental consultant at a total additional cost of over \$200,000 to satisfy the requirements of the initial permit.

To meet the requirements of the proposed permit, it is estimated that consultants' fees will at least triple to provide the same level of assistance. Given the deadlines for meeting the requirements of the proposed permit, the Town will be hard pressed to find funding sources for this increased cost at a time when due to the poor economy there is decreased revenue and decreased State Local Aid. While the Town supports improving water quality, the extensive requirements of the proposed permit with such aggressive time frames will be an undue economic burden.

The above notwithstanding, the Town of Milford offers the following specific comments on the Draft General Permit for Stormwater Discharges from Small MS4s in Massachusetts North Coastal Watersheds (the "DGP"):

- The DGP requires that a map of the entire separate storm sewer system be completed within two (2) years of the effective date of the permit (Section 2.4.4.6). This task will necessitate contracting surveyors/engineers at substantial expense (\$300,000 to \$400,000) with the Town required to procure funding prior to entering into a contract for this mapping effort. The scope of work associated