



TOWN OF WAYLAND
MASSACHUSETTS
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CONSERVATION COMMISSION

TOWN BUILDING
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March 31, 2010

EPA Region 1
Attn: Thelma Murphy
Office of Ecosystem Protection
5 Post Office Square, Suite 100
Mail Code: OEP06-4
Boston, MA 02109-3912

Re: Proposed General Permits for Stormwater Discharges from SM4s in
Massachusetts North Coastal Watersheds

Dear Ms. Murphy,

The following comments are submitted with respect to the proposed General Permit for the Massachusetts North Coastal Watersheds. It is acknowledged that the proposed permit incorporates many of the existing General Permit requirements and then expands on certain of those requirements. Some of the broadened requirements appear to seek more attention to illicit discharges as well as a refinement of the documentation with respect to monitoring as well as record keeping and reporting. Evaluating the effectiveness of public education is going to require more attention by the Town.

The requirements of the proposed General Permit, the narrative of actions to be implemented, and the requirements complement existing stormwater activities that are currently in place in Wayland. There is going to be a need to investigate responsibilities and funding to increase the documentation and responses needed under the proposed General Permit.

Given the various demands on shrinking revenues available to the Town, the efforts that will need to be expended to comply with the components of the General Permit will necessitate a re-allocation of resources as well as a renewed, concerted, and cooperative effort by staff, Boards, Commissions, and departments to achieve compliance with the requirements of the Permit. While the work invested in the first MS4s General Permit has provided a valuable basis for the Town's stormwater program, there are areas that are going to need extra effort to meet such items as the expanded illicit discharge detection and elimination program (IDDE) given that this is one of the areas that the existing Stormwater Permit needs to be enhanced.

A variety of departments within the town do and can continue to contribute to meeting the requirements of the proposed General Permit. There is a need for example, to implement a coordinated inspection and documentation effort that can thereafter be incorporated into the Town's reporting. For example the town regularly contracts for catch basin cleaning and now will have to create some system for documentation of that effort as well as review the requirements of the proposed General Permit to determine if there are modifications to the existing contract that will enable the Town to obtain more documentation of the work.

Outfall monitoring is going to require an effort that heretofore has not been well defined within a particular position or a combination of positions that as a whole address the requirements of the General Permit.

While the Town has participated in a number of public education efforts including taking advantage of material provided by SuAsCo an evaluation of the effectiveness of the efforts is going to be challenging. In addition, while SuAsCo is invaluable EPA should consider making available more education tools that can be easily adopted by a Town for distribution to the various constituents.

There is discussion of exploring stormwater utilities. While this is a way to provide funding this is another expense that would be passed on to the applicable parties at a time when fees and taxes are increasingly becoming a burden for many in the community. There has to be some recognition that the General Permit does require expenditures by the Town at a time when the demand exceeds the capacity to generate the funds for the many services and projects that the Town currently faces. As noted with the education materials, it is hoped that EPA will continue to provide support that can supplement and complement the efforts of MS4 communities. Evaluation of a community's efforts is going to have to consider the limitations of a town to find resources to achieve all of the goals and credit given for alternative actions that contribute to improved water quality.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Monahan', with a long horizontal line extending to the right.

Brian J. Monahan,
Conservation Administrator

Cc