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SENATOR MICHAEL O. MOORE
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January 27, 2011

Ms. Thelma Murphy
U.S. Environmental Protection Agency, Region 1
Mail Code – OEP06-4
5 Post Office Square, Suite 100
Boston, MA 02109

Ms. Murphy,

I write to echo the serious concerns expressed by the Town of Shrewsbury, which I am privileged to represent in the Senate, regarding the draft Stormwater Permit issued to the town by the EPA.

The draft permit received by Shrewsbury will place an undue burden on the town, which – like most municipalities today – is operating with little financial leeway or maneuverability, due to reductions in state aid and the limits of Proposition 2 ½.

The administrative requirements of the draft permit will tax the extremely limited time of municipal employees. Additionally, the monetary costs associated with this permit are prohibitive. Municipalities, like the Commonwealth, must pass fully balanced budgets each year. They are severely hampered by limitations on raising new revenues, depressed property tax collections in recent years, and a loss of outside aid. Cities in towns are not in a position to absorb large expenses which will not generate new revenue or address a vital need.

The street sweeping requirements of the permit are also unfeasible for the community, which has in the past done an efficient job of addressing this need. As stated in the letter sent to you by the Shrewsbury Board of Selectmen on January 10, this requirement would have the town operating sweeping equipment during the winter months, when use of the equipment involved is extremely impractical.

Creating a Stormwater utility is not a viable option for the Town to address this problem, when taking into consideration the implementation costs, as well as the length of time that would be needed for the program to generate enough funds to sustain itself. The financial burdens of the draft permit will hit the community far sooner.

While I respect the goals and intentions of the Environmental Protection Agency, I cannot support efforts that do not take into consideration the unmanageable strain being placed on local governments. The Federal Government has the capacity to “deficit spend,” increasing its expenditures regardless of revenue. Neither the Commonwealth nor cities and towns have this ability, and must operate within their means. I

would respectfully ask you to re-consider the demands being placed on Shrewsbury, and other communities.

Sincerely,



Senator Michael O. Moore
Second Worcester District

Cc: Shrewsbury Board of Selectmen