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Town of Bedford, New Hampshire

August 15, 2013

USEPA
5 Post Office Square – Suite 100
Mail Code-OEP06-4
Boston, MA 02109-3912
ATTN: Newton Tedder

Re: Comments on the 2013 Draft MS4 NPDES Permit

Dear Mr. Tedder:

With respect to the proposed 2013 Draft MS4 NPDES Permit issued on February 12, 2013, please accept this letter as the Town of Bedford's supplement to the comments provided under separate cover from the MS4 Coalition of New Hampshire communities. The Town of Bedford is a member of and is in support of the comments contained within the Coalition's letter, and hereby incorporates by reference the Coalition's comments.

Furthermore, it is the Town's firm belief that the proposed regulations contained within the draft MS4 permit will be overly burdensome to this community. The costs required in attempting to comply with the regulations -- both in administration and in implementation of the proposed minimum control measures -- far exceed current town budget. For instance, even though the Town of Bedford has no direct or proximate frontage on Sebbins Pond (one of the many waterbodies for which the Town would be responsible), the TMDLs established by the draft MS4 permit would require the Town to spend a minimum of $700,000 – close to one year's annual road maintenance budget—in attempting to meet one component of the permit requirements.

In addition to cost concerns, MS4 communities such as the Town of Bedford will be responsible for controlling, regulating and maintaining run off/discharge from properties that are not within its direct control, such as but not limited to public school properties over which the Town of Bedford has no budget or administrative authority, as well as no zoning oversight under current New Hampshire state statutes.

Thank you for considering our comments and we look forward to your response.

Sincerely,

Jessie W. Levine
Town Manager