**BARTOLINI BUILDERS INC.**
*RESIDENTIAL — COMMERCIAL — LAND*
4 Wyeth Circle • Southborough, Massachusetts 01772
JACK (508) 481-5512 FAX (508) 303-4995 DAVID (508) 481-7274

March 7, 2011

Ms. Kate Renahan
United States Environmental Protection Agency-Region 1
Office of the Regional Administrator
5 Post Office Square-Suite 100, Mail Code ORA01-1
Boston, Massachusetts 02109-3912

RE: Comments on the Draft Massachusetts Interstate, Merrimack, and South Coastal Small MS4 NPDES General Permit

Dear Ms. Renahan:

We would like to provide the Environmental Protection Agency (EPA) comments on their draft National Pollutant Discharge Elimination System (NPDES) "General Permits for Stormwater Discharges From Small Municipal Separate Storm Sewer Systems in Massachusetts Interstate, Merrimack, and South Coastal Watersheds" (draft permit).

We are concerned with the overall impact these regulations will have on land development in the Town of Southborough. Based on our review of these draft regulations, the costs to develop land within Southborough will increase dramatically in order to meet the stricter levels of treatment and infiltration required due to the presence of the Sudbury Reservoir and the Sudbury River in Southborough. We are concerned that the officials in Southborough will be hesitant to accept any new subdivisions as public roads, due to the increased reporting, monitoring, and operations and maintenance requirements set forth by the draft regulations.

Any new subdivisions discharging to the Sudbury Reservoir or its tributaries will be required to obtain individual NPDES permits, and the level of pre-treatment and infiltration required for these discharges will be even higher than the current Massachusetts Stormwater Standards. The imposition of such strict regulations which make towns and cities afraid of accepting new subdivisions represents a substantial devaluing of the land held by private developers. Given the anemic recovery, or lack thereof, currently occurring in the Massachusetts housing sector, these proposed regulations are ill timed and will serve to act as a brake on future land development within the State. Also, the draft permit costs that local cities and towns will be faced with will simply cause those affected municipalities to enact increased taxes, causing further economic harm to the State.

We strongly urge the EPA to pare back the requirements of this draft permit in recognition of the extremely adverse economic effects that will be caused by the draft permit's implementation. Thank you for the opportunity to provide you comments.

Sincerely,

John Bartolini Jr

CC: U.S. Senator John Kerry
U.S. Senator Scott Brown
U.S. Representative James McGovern
MA State Senator Jamie Eldridge
MA State Representative Carolyn Dykema
MA State Representative Steven Levy
Frederick Civian, MassDEP Stormwater Coordinator