

Town of Southborough

PLANNING BOARD

SOUTHBOROUGH, MASSACHUSETTS 01772

17 COMMON STREET
SOUTHBOROUGH, MASSACHUSETTS 01772-1662
508-485-0710

March 11, 2011

United States Environmental Protection Agency, Region 1
Office of the Regional Administrator
5 Post Office Square, Suite 100
Boston, MA 02109-3912
Attn: Kate Renahan

RE: Draft Massachusetts Interstate, Merrimack and South Coastal
Small MS4 General Permit

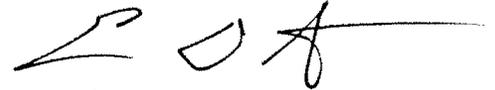
Dear Ms. Renahan,

At their regularly scheduled meeting on Monday, March 7, 2011, the Southborough Planning Board met with Town Engineer John Woodsmall, PE to review the Draft Massachusetts Interstate, Merrimack and South Coastal Small MS4 General Permit. The discussion focused on the excessive financial burden this will place on the community and the adverse impacts the permit's mandates will have on the local and regional economy. Although the Board supports the ultimate goal of improving water quality and preserving a limited natural resource, the magnitude of the draft permit's impact to the community do not justify the potential gains, which are unknown and may have limited benefit to water quality in the Town.

Letters dated February 17, 2011 from the Southborough Board of Selectmen and Department of Public Works provide detailed itemizations of the negative impacts to the community, including a significant financial burden. The Commonwealth of Massachusetts will reduce local aide to communities throughout the state for the fourth consecutive year and there has been no funding from the federal government for implementing the proposed mandates in the draft permit. In a time when all governments at the local, state and federal level are struggling to balance budgets and maintain current services, the fiscal impacts of the permit are not warranted. In addition to the financial burden to municipalities, the permit requirements will have a similar effect on business and development. Implementing the permit requirements and the associated costs could cripple the economic recovery by tipping the financial balance of projects that are struggling during the current recession.

Upon conclusion of their meeting, the Planning Board voted unanimously to support the position of the Southborough Board of Selectmen regarding the Draft Massachusetts Interstate, Merrimack and South Coastal Small MS4 General Permit. The Southborough Planning Board echoes the concerns and comments raised by the Selectmen and Department of Public Works and asks the Environmental Protection Agency to conduct further evaluation of the permit's fiscal impacts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Denoncourt', with a long horizontal flourish extending to the right.

Eric Denoncourt
Town Planner

CC: US Senator John Kerry
US Senator Scott Brown
US Representative James McGovern
MA State Senator Jamie Eldridge
MA State Representative Carolyn Dykema
MA State Representative Steven Levy
Frederick Civian, MassDEP Stormwater Coordinator
Southborough Board of Selectmen
Jean Kitchen, Town Administrator
John Woodsmall, Town Engineer
Karen Galligan, Superintendent of Public Works