

July __, 2022

By Electronic and First Class Mail

Mr. Todd Borci
United States Environmental Protection Agency
Region 1 – EPA New England
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Re: Joint Letter from Town of Arlington Boards and Commissions

Dear Mr. Borci:

Please accept this initial letter of comment and support on behalf Select Board of the Town of Arlington, the Arlington Conservation Commission, and...[insert appropriate boards and commissions] (collectively “Arlington”). In brief, Arlington joins its residents and advocacy groups, including but not limited to the Mystic River Watershed Association and Save the Alewife Brook in respectfully urging early scrutiny and continued opportunities for public engagement as the MWRA, Cambridge, and Somerville develop long-term control plans for the for reduction and management of Combined Sewer Overflow (“CSO”) outfalls into the Alewife Brook. The Town joins many others in lauding the investments and successes to date of our neighboring cities and the MWRA throughout the Greater Boston Area and its watersheds. However, the Town also believes that despite earnest efforts, the water quality of the Alewife Brook and the number and severity of CSO discharges remains an enormous environmental concern for this community and its neighbors. As such, an appropriate “scope of work” in this early stage of long-term control plans development is a critical and necessary predicate to your consideration of their applications for variances from water quality standards and NPDES permits. We therefore register our agreement with the EPA’s feedback to date and urge the EPA and MassDEP to continue to insist upon five (5) critical components of any scope of work:

1. Revised “typical year modeling” for the Alewife that captures the increasing frequency of severe weather events;
2. Holistic evaluation of CSO discharges, flooding, and Inflow and Infiltration (“I/I”) within not only Cambridge and Somerville, but also their upstream neighbors;
3. Additional CSO controls to address the conditions of the future;
4. Thorough affordability analysis; and
5. Meaningful public input into draft proposals.

As each of the foregoing has already been highlighted by the EPA, the Town will limit its comments on each at this juncture except to emphasize select points.

Foremost, Arlington’s chief concern is that water quality monitoring and modeling factors for climate change and extreme weather events, rather than relying heavily on data from decades in which the number and severity of high volume discharges was significantly different from contemporary conditions. Given that any control plan will be framed by the modeling’s characterization of the challenge, Arlington appreciates and supports the EPA’s May 11, 2022 Correspondence to the MWRA, Cambridge and Somerville, which, among other things:

- Requested the impact of climate change be incorporated into their joint modeling, informing the long-term control plan by applying National Oceanic and Atmospheric Association (“NOAA”) guidance and particularly accounting for select precipitation events and changing high tides to revise the formulation of a “typical year;”
- Noted such modeling revisions’ consistency with Somerville’s “Somerville Climate Forward” initiative, and Cambridge’s “Resilient Cambridge” and “Climate Change Preparedness and Resilience” plans; and
- Highlighted the importance of collaboration between variance to propose an appropriate “typical year” design scheme” and how wastewater infrastructure plans today need to be prepared for the evolution of our climate in the future.

To that end, Arlington also registers its support for forward-looking evaluation of additional CSO controls for the Alewife Brook. Arlington concurs that the draft scopes of work to date are ambiguous. An aggressive and flexible plan is necessary to make meaningful improvements to water quality, which in turn will necessitate broad improvements both in the separation of combined sanitary sewer systems and CSO storage, but also the removal (or mitigation) of significant stormwater and groundwater sources. Germane to this point, it was noted at a recent Somerville-Cambridge joint public meeting that Arlington can have input when it invests itself in aiding the reduction of CSO sources. However, Arlington has in fact invested substantial resources to achieve exactly reductions in the areas noted by the EPA and will continue to do so. As such, the Town would welcome a holistic evaluation to better identify what we have done and can do in

the future to reduce sources of infiltration into the system, but alongside additional CSO controls and storage investments by variance holders.

Finally, Arlington values the opportunity for residents, stakeholders, and officials to continue to register comment on the draft scope of work and long-term control plans early and often. As the EPA noted in its correspondence, public comment at the hearing phase does little service to variance holders themselves, the EPA, Mass DEP, or the public, without meaningful opportunity to provide input, ask questions, and engage in earlier developmental stages. We hope the MWRA, Cambridge and Somerville will continue the good practice of soliciting questions and comments before they are wedded to scopes and proposals. CSO outfalls in the Alewife Brook are a regional environmental concern, and we credit the earnest efforts of our neighbors to adapt to climate change. However, the impacts of outfalls are and will continue to be felt most acutely and directly by Arlington's people and habitat areas. It is essential that Arlington voices continue to be heard throughout this process.

Please advise us through our counsel if you have any questions for us, or would like additional support for any of the comments registered herein. We extend the same invitation to our friends and partners in Cambridge, Somerville and the MWRA.

Very truly yours,

On behalf of the Arlington Select Board, Conservation
Commissions, and _____ as their chairs,

Lenard Diggins

Susan Chapnick

cc: Eric Worrall, MassDEP
Kevin Brander, MassDEP
David Coppes, MWRA
Richard Raiche, City of Somerville
Kathy Watkins, City of Cambridge