

From: arlington@savethealewifebrook.org

Subject: Alewife Brook CSO Update

Date: Oct 28 2022, at 11:59 am

To: Lenard T. Diggins <ldiggins@gmail.com>, dianemahon <dianemahon@verizon.net>, john@johnhurdlaw.com, sdecourcey@verizon.net, dheim@town.arlington.ma.us, 'David Morgan' <dmorgan@town.arlington.ma.us>, eric@erichelmuth.com

Cc: 'David White' <dwhite@gilbertwhite.com>, 'G Speeth' <gaspeeth@gmail.com>, 'dstoff' <dstoff@rcn.com>, 'Eugene Benson' <eugene.b.benson@gmail.com>

Dear Chair Diggins, Members of the Select Board, Town Counsel, and Town Conservation Administrator,

Save the Alewife Brook would like to keep you updated on the progress associated with our efforts to advocate for desperately needed improvements to the Alewife Brook.

We have exciting news for you!

First, regarding **the terrible odor**:

Over the summer, on our day trip to visit the MWRA's sewer system, Save the Alewife Brook's David Stoff inquired about odor control on the Alewife Greenway, specifically at the Alewife Brook Sewer siphon manhole along the path near Bicentennial Park. As a result of Mr. Stoff's inquiry, the MWRA sealed the manhole cover with clear caulking. **This \$5 solution worked!** Now it doesn't stink of sewage around this one manhole. The odor from the sewer system causes a gag reflex and ruins many nice walks in our park. There is potential for much more odor control to be done as it is still extremely smelly in other areas around the Alewife Brook.

Second, regarding the 2019 CSO Variances (permits to pollute through sewage pollution discharges) and the new Long-Term Alewife **CSO Control Plan**:

The 2019 Alewife Brook CSO Variances expire on August 31, 2024. A requirement of the Variances is that a control plan be in place to improve conditions. As you are aware, the process has begun to create a new CSO control plan. However, the Alewife CSO Permittees (Cambridge, Somerville, and MWRA) have recently requested **a 36-month deadline extension** for completion of the plan. Please see the attached PDF, which contains the recent letters from Cambridge, Somerville, and MWRA to Mass DEP.

Cambridge, Somerville, and MWRA have promised to use this additional 36 months to develop a sewer infrastructure and performance **model that includes the projected impacts of Climate Change** on precipitation in the coming decades. This consideration of future climate change for CSO control is something that has never been done before. If the owners of the CSOs follow through on this promise, it will be **a huge win for Alewife Brook!**

There are many great cities in the World facing the same problem with combined sewer overflow pollution in their rivers and lakes, including: London, Paris, New York, Philadelphia, Chicago, Detroit, Seattle, San Francisco, and Washington DC, among many other old cities. No other city is using a CSO model that includes Climate Change projections. This would mean that **Cambridge, Somerville, and MWRA could be World leaders in the fight to combat the effects of Climate Change.** It would be revolutionary.

Enthusiasm for Climate Change planning aside, Save the Alewife Brook refuses to allow 36 months to go by without any tangible progress to mitigate the severe health risks associated with the deprecated state of the Alewife Brook. Therefore, **Save the Alewife Brook will soon respond**

to the request from Cambridge, Somerville, and MWRA with reasonable demands for immediate improvements.

Thank you for your continued support.

Sincerely,

Kristin Anderson

David White

[Save the Alewife Brook](#)



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
100 First Avenue, Building 39  
Boston, MA 02129

Frederick A. Laskey  
Executive Director

Telephone: (617) 242-6000  
Fax: (617) 788-4899  
TTY: (617) 788-4971

September 22, 2022

Mr. Eric Worrall  
Regional Director, MassDEP  
Northeast Regional Office  
205B Lowell Street  
Wilmington, MA 01887

## **RE: Schedule Extension Request for Deliverables Associated with the Updated CSO Control Plans**

Dear Mr. Worrall:

In response to correspondence from the Massachusetts Department of Environmental Protection ("MassDEP") dated July 22, 2022, the Massachusetts Water Resources Authority ("MWRA") formally requests a 36-month extension to the schedule for the deliverables associated with an Update to the Combined Sewer Overflow ("CSO") Long Term Control Plan for MWRA's CSO outfalls discharging to the Charles River and Alewife Brook/Upper Mystic River Basins. As further detailed below, this will result in extending the 2019 Variances to at least 2027. MassDEP's July 22<sup>nd</sup> correspondence conditionally-approved MWRA's Updated CSO Control Plan—Draft Scope of Work and Schedule, explaining in relevant part, that "[i]f MWRA wishes to pursue a schedule extension, by September 1, 2022 [subsequently extended to September 22], MWRA and the Cities of Cambridge and Somerville shall submit a combined Gantt chart that shows a proposed detailed schedule for completion of all deliverables under the [2019] Variances, and MWRA shall submit a formal extension request that justifies the need for additional time."

In support of this extension request and in accordance with MassDEP's instructions, attached please find a proposed Gantt chart, which has been agreed upon by the Cities of Cambridge and Somerville, as well as by MWRA. As you will see in the Gantt chart, only two of the remaining deliverables set forth in the 2019 Variances are impacted by this request, including the dates by which MWRA will submit its Draft and Final versions of its Updated CSO Control Plan to MassDEP and EPA for approval.<sup>1</sup> As further detailed below, although there will be coordination and collaboration between MWRA and the Cities of Cambridge and Somerville, including with respect to the Typical Year and public participation, MWRA believes that it is important that each party submit their own CSO Control Plans to MassDEP.

---

<sup>1</sup> The other remaining deliverables in the 2019 Variances, including: (a) July 15<sup>th</sup> (each year) Annual Water Quality Sampling Report, (b) April 15<sup>th</sup> (each year) Joint Press Release, (c) April 30<sup>th</sup> (each year) website posting of Annual Duration and Volume of permittees' CSO discharges to variance waters, (d) January 31<sup>st</sup> (each year) Annual Progress Reports on implementation of Additional System Optimization Measures, and (e) December 2022, CSO System Optimization for Alewife Brook and Lower Charles River Basins Project, Study and Preliminary Design, are not altered by this request.

This extension request is well justified. In particular, the substantial collaboration between MWRA and the Cities of Cambridge and Somerville that is required to develop effective and useful Updated CSO Control Plans, which simultaneously meet the requirements of MassDEP's and EPA's conditions and clarifications, necessitates an extension of the current schedule. In further support of this extension request, MWRA details both the anticipated level of effort and challenges driving the time required to effectively perform these tasks that ultimately lead to the Final Updated CSO Control Plan submittals.

- Updating the Typical Year: Since March 2022, MWRA, Cambridge, and Somerville have been working to develop a typical year that not only reflects average rainfall and intensity in recent years, but considers the projected impacts of climate change on precipitation in the coming decades. Consultants hired by Cambridge are conducting rigorous statistical analyses and using a novel methodology, as well as getting input from a climate expert at Cornell University. Combined with the need for agreement on the final typical year by all three parties, this process is time consuming. EPA and MassDEP have stressed the importance of public input in this process, which adds even more time. Lastly, having an updated typical year is required prior to any alternatives analyses conducted as part of the Updated CSO Control Plans, so further progress cannot be made until it is completed. Since the 2019 Variances did not mention the development of an updated typical year that considers climate change, adding this key component will take longer than expected.
- Public Participation: The 2019 Variances state that MWRA and the municipalities must develop a "public participation plan sufficient to provide for ample opportunities for the public to be informed about the development of the Plans at critical junctures, and to have opportunities to provide informed comments on the CSO abatement alternatives and recommendations." Based on the first public meeting held in June 2022, not only will more meetings be required than initially anticipated, but preparation for each one is very time consuming. Sufficient time is needed for notice and outreach to communities and Environmental Justice populations as required through the recent revisions to the MEPA regulations, which became effective in January 2022. These new requirements include comprehensive translation services and additional time to address public comments, which are critical to productive public input.
- Alternatives Analysis: Each CSO control alternative will be evaluated using the new typical year and unified model currently under development by the variance holders. An Alternatives Analysis is key to developing the Updated CSO Control Plans and has been highlighted as an important aspect of the public participation process. Giving the public an opportunity to provide meaningful input into the development, screening, and selection of alternatives is expected to require three public meetings over the course of more than a year and a half. This should provide adequate time before and in-between public meetings to prepare and provide meaningful responses and insight into public concerns and comments. As a result, the Alternatives Analysis will take longer than expected.
- MEPA Review: The development of a Special Review Process (akin to the MEPA methodology used in the development of the existing Long Term CSO Control Plan in the mid-1990s) with the MEPA office, MassDEP, Cambridge, Somerville, and MWRA for the Updated CSO Control Plans is still underway and it is unclear how long the process will take. Based upon recent discussions with the MEPA office, MWRA understands that while

some MEPA processes may run concurrently with ongoing work for the development of the Updated CSO Control Plans, additional time will be needed once a draft plan has been proposed. Although MEPA review was mentioned in the 2019 Variances, it was not clear that the process would apply to planning and program development in addition to any individual projects. This unanticipated step will extend the original schedule.

- Preparation of the Draft and Final Updated CSO Control Plans: Preparing both the draft and final Updated CSO Control Plans requires several months of coordinating the drafting of the reports, as well as time for MWRA, Cambridge, and Somerville to review each other's reports and provide comments, and for those comments to be incorporated before each draft Updated CSO Control Plan is submitted to MassDEP and EPA. Both EPA and MassDEP have consistently stressed the importance of collaboration between MWRA, Cambridge, and Somerville in developing the Updated CSO Control Plans. Additional time beyond the original schedule is required to successfully meet this request and submit coordinated effective Updated CSO Control Plans.

MWRA, in coordination with Cambridge and Somerville, and our respective consultants, have concluded that the enhanced efforts described above will require an additional 36 months to submit the Final Updated CSO Control Plans (December 31, 2026). The 2019 Variances expire on August 31, 2024, which is far short of the additional time needed to be fully responsive to MassDEP, EPA, and the public.

As a result, MWRA also respectfully suggests that MassDEP consider moving forward with the process that would support this extension request and ensure Variances are in place for an appropriate period beyond the requested December 31, 2026 Final Updated CSO Control Plan submittals. The 2019 Variances includes a period of 8 months beyond the submission of Final Updated CSO Control Plans. At a minimum, 8 months should be added beyond the new submission date for the Final Updated CSO Control Plans, bringing the Variances to at least August, 2027. MassDEP may determine that additional time is needed to consider a framework for MWRA and the communities to continue operating their systems while beginning the process of implementing the Final Updated CSO Control Plans, once approved. Considering the additional level of effort and public involvement to be performed over the next several years in developing Draft and Final Updated CSO Control Plans, MWRA recommends that Variances in support of this request should merely provide a time extension, and not result in additional variance conditions that would take away consultant and staff resources dedicated to the Updated CSO Control Plan efforts.

Finally, MWRA has considered the City of Cambridge's approach, that MWRA, Cambridge, and Somerville prepare a common Updated CSO Control Plan. MWRA does not support this approach. MWRA believes that at least three compelling factors associated with the Updated CSO Control Plan development counsel in favor of the submittal of separate, but coordinated Updated CSO Control Plans by each entity. These factors include: (1) independent affordability analyses required by the three parties influencing each entities ability to apply capital resources to further CSO control; (2) MWRA CSOs that are largely hydraulically independent of Cambridge and Somerville (e.g., MWR010, 018, 019, 020, & 023) and vice versa; and (3) Cambridge's and Somerville's need to consider separate stormwater flooding and pollutant load implications. MWRA acknowledges that there are CSO control alternatives that must be evaluated and considered together, and that the parties will need to closely collaborate to develop tools to be used

in alternatives evaluation (unified model), an Updated Typical Year, and public input. MWRA is committed to this collaboration.

Thank you for your consideration of this request. If you have any questions, please contact me at 617-799-8880.

Sincerely,



David Coppes  
Chief Operating Officer, MWRA

cc (all via Email):

Kathy Baskin, MassDEP  
Susannah King, MassDEP/NERO  
Todd Borci, EPA  
Michael Wagner, EPA  
Jeff Kopf, EPA  
Carolyn Fiore, MWRA  
Rebecca Weidman, MWRA  
Betsy Reilley, MWRA  
Michael Altieri, MWRA  
Brian L. Kubaska, MWRA  
Kathy Watkins, City of Cambridge  
Catherine Woodbury, City of Cambridge  
Rich Raiche, City of Somerville  
Lucica Hiller, City of Somerville

Updated CSO Control Plan Schedule

CSO Control Plan Scope and Schedule

Typical Year Development

Unified Model Development

Alternatives Development & Analysis

Draft Updated CSO Control Plan Preparation

MEPA Review Proces #1 and #2/To Include DEP/EPA Final Comments

Final Updated CSO Control Plan Preparation

Current Variance End Date (August 2024)

Public Participation-Outreach Prep and Mtgs

Meeting # 1- Introduction/History

Meeting #2- Present Typical Year & Solicit Public Goals

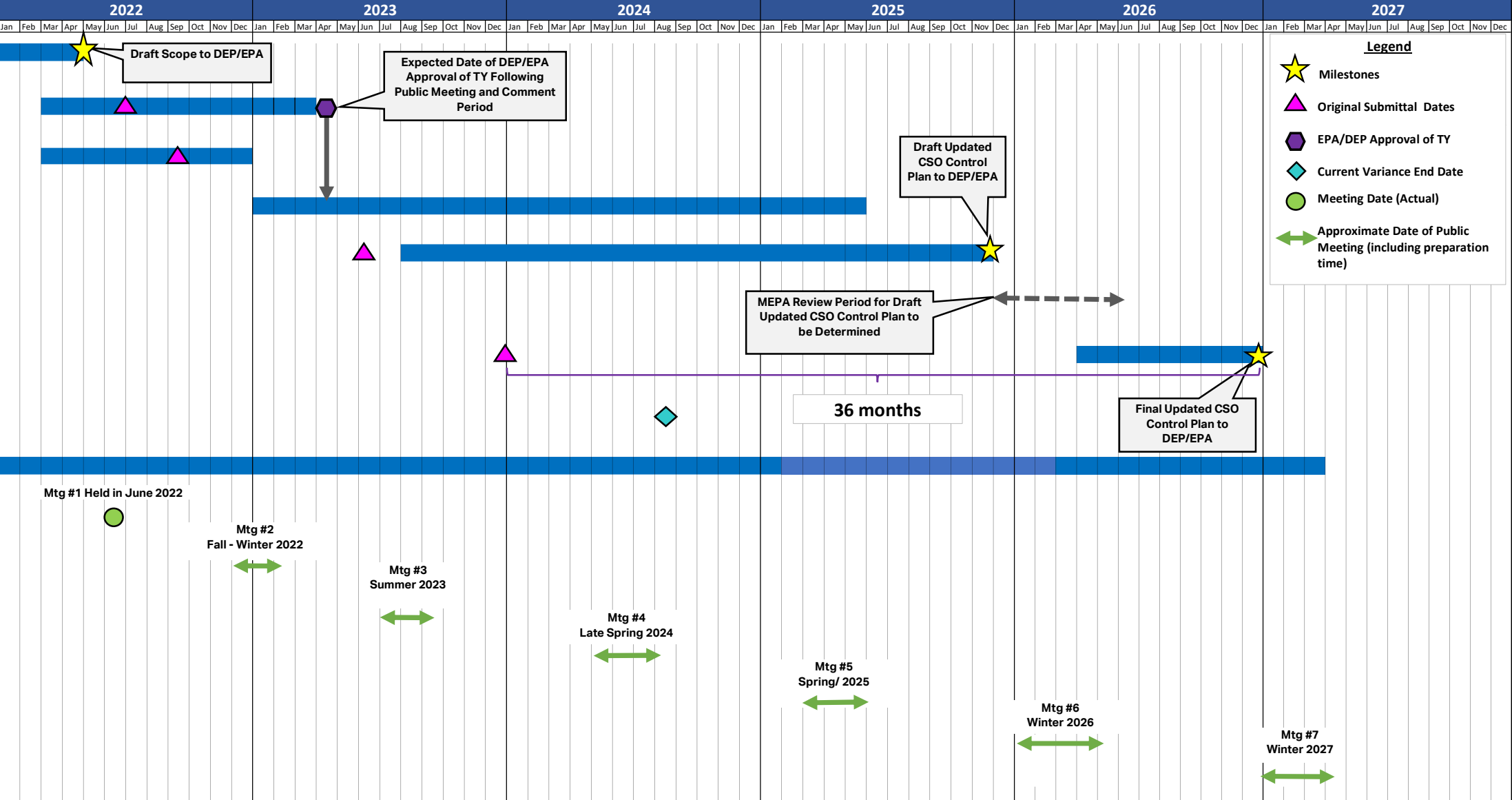
Meeting #3 - Alternatives Development /Weighting Factors

Meeting #4- Alternatives Screening/Affordability Analysis

Meeting #5-Results of Alternative Analysis

Meeting #6 - Present Draft Plan

Meeting #7 - Present Final Plan



CITY OF SOMERVILLE, MASSACHUSETTS  
KATJIANA BALLANTYNE  
MAYOR  
DEPARTMENT of INFRASTRUCTURE & ASSET MANAGEMENT  
ENGINEERING DIVISION



RICHARD E. RAICHE, PE, PMP  
DIRECTOR OF INFRASTRUCTURE & ASSET MANAGEMENT

BRIAN POSTLEWATE, PE  
DIRECTOR OF ENGINEERING

September 22, 2022

Mr. Eric Worrall  
Regional Director, MassDEP  
Northeast Regional Office  
205B Lowell Street  
Wilmington, MA 01887

**RE: Schedule Extension Request for Deliverables associated with the City of Somerville  
Updated CSO Control Plan**

Dear Mr. Worrall,

The City of Somerville formally requests a **36-month extension** to the schedule for the deliverables associated with the Updated Combined Sewer Overflow (CSO) Control Plan (the Plan) for Somerville's permitted CSO outfalls discharging in the Alewife Brook and Mystic River. As requested in your July 22, 2022 conditional approval of the Updated CSO Control Plan Scope of Work and Schedule associated with the 2019 Variance for CSO Discharges to the Alewife Brook/Upper Mystic River Basin (2019 Variance), we are attaching a Gantt chart that shows this schedule extension and includes the major milestones of the development of a Final Updated CSO Control Plan process. This Gantt chart was developed in collaboration with and agreed upon by the cities of Somerville, Cambridge, and the Massachusetts Water Resources Authority (MWRA).

The substantial collaboration between our three entities required to develop effective and useful Updated CSO Control Plans that also meet the requirements of MassDEP and EPA's conditions and clarifications and includes a robust public participation plan are the main reasons that justify this schedule extension request. Somerville currently meets bi-weekly with Cambridge and MWRA to coordinate on all major aspects of our scopes of work for the Plans. More detail on anticipated level of effort and challenges driving the time required to effectively perform this work is included below:

- **Updating the Typical Year:** Somerville, Cambridge, and the MWRA have been working together since March 2022 to develop an updated Typical Year that not only reflects average







precipitation and intensity from recent years but considers the projected impacts of climate change on precipitation in the coming decades. Through this process, we have been unable to find other examples where projected impacts of climate change have been incorporated into a Typical Year. For this reason, Cambridge has retained a consultant to conduct rigorous statistical analyses, as well as receive input from a climate expert at Cornell University to assist with developing the Typical Year. We need additional time to complete a thorough analysis, build consensus between our three entities, engage the public in this process, and ultimately present the Typical Year for review and acceptance by EPA and MassDEP. Only after this process can Somerville, Cambridge, and MWRA begin the alternatives analysis process.

- **Alternatives Analysis:** Each CSO control alternative will be evaluated using the new Typical Year and unified model currently under development by Somerville, Cambridge, and MWRA. An Alternatives Analysis is key to developing the Plans and has been highlighted as an important aspect of the public participation process. Having an updated Typical Year is required prior to beginning any alternatives analyses as part of the Plans, so further progress cannot be made until the Typical Year is completed. Giving the public an opportunity to provide meaningful input into the development, screening, and selection of alternatives, inclusive of the affordability aspect of the selection process, is expected to require three public meetings over the course of more than a year and a half. We believe this timeframe is adequate and provides sufficient time before and in-between the meetings to consider, prepare, and provide meaningful responses and insight into public concerns and comments.
- **MEPA Review:** The development of a Special Review Process (akin to the MEPA methodology used in the development of the Existing Long Term CSO Control Plan in the mid-1990s) with the MEPA office, MassDEP, Cambridge, Somerville, and MWRA for the Plans is still underway and it is unclear how long the process will take. Based upon recent discussions with the MEPA office, Somerville understands that while some MEPA public outreach processes may run concurrently with ongoing work for the development of the Plans, additional time will be needed once a Draft Plan has been proposed. Although MEPA review was mentioned in the 2019 Variance, it was not clear that the process would apply to planning and program development in addition to the projects that will eventually be recommended. This unanticipated step will extend the original schedule.
- **Public Participation:** The 2019 Variance states that Somerville must develop a “public participation plan sufficient to provide for ample opportunities for the public to be informed about the development of the Plans at critical junctures, and to have opportunities to provide informed comments on the CSO abatement alternatives and recommendations.” EPA and MassDEP have stressed the importance of considering public input throughout this process. This schedule extension request reflects Somerville’s commitment to a robust public engagement and outreach process. Additional time is being requested to allow for an enhanced public outreach effort that includes continued coordination with Cambridge and MWRA, preparation of information for public review and comment in multiple languages associated with the





Environmental Justice communities potentially impacted by these Plans, and incorporation of feedback into the ongoing analysis.

- **Preparation of the Draft and Final Updated CSO Control Plan:** Preparing both the Draft and Final Plans includes several months to coordinate the drafting of the reports, as well as time for Somerville, MWRA, and Cambridge to review each other's reports, provide comments, and for those comments to be incorporated before each Draft Plan is submitted to MassDEP and EPA. Both EPA and MassDEP have consistently stressed the importance of collaboration between Somerville, MWRA, and Cambridge in developing these plans. Additional time beyond the original schedule is required to successfully meet this request and submit coordinated effective Updated CSO Control Plans.

Somerville, in coordination with Cambridge, MWRA, and our respective consultants, have concluded that the enhanced efforts described above will require an additional 36 months to complete and submit the Final Updated CSO Control Plans by December 31, 2016. Somerville acknowledges that existing 2019 Variances will expire on August 31, 2024, far short of the additional time needed to be fully responsive to MassDEP, EPA and the public. As a result, Somerville is supportive of MWRA's suggestion that MassDEP consider a process to ensure that Variances are in place for an appropriate period beyond the requested December 31, 2026 Final Updated CSO Control Plan submittals.

Somerville appreciates the support received from MassDEP, EPA, and the public for a common Updated CSO Control Plan and is open to the creation of such a plan. However, we acknowledge MWRA's reservation. Somerville is comfortable with the coordination between our three entities so far and is committed to continue the collaboration on the development of important aspects that are common and instrumental to the success of our efforts such as the unified model, Typical Year, public outreach evaluation of some alternatives, and schedule. Somerville is confident that this collaboration will ensure that our Plans are incorporating alternatives that must be evaluated and considered together.

Thank you for your consideration of this request. If you have any questions, please contact me at [lhiller@somervillema.gov](mailto:lhiller@somervillema.gov) or 617- 448-3716.

Sincerely,

*Lucica Hiller*

Lucica Hiller  
Stormwater Program Manager, City of Somerville

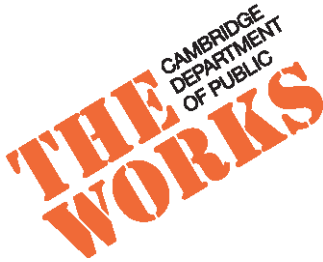




cc (all via Email):

Rich Raiche, City of Somerville  
Kathy Baskin, MassDEP  
Susannah King, MassDEP/NERO  
Todd Borci, EPA  
Michael Wagner, EPA  
Jeff Kopf, EPA  
Carolyn Fiore, MWRA  
Rebecca Weidman, MWRA  
Betsy Reilley, MWRA  
Michael Altieri, MWRA  
Brian L. Kubaska, MWRA  
Kathy Watkins, City of Cambridge  
Catherine Woodbury, City of Cambridge





City of Cambridge  
Department of Public Works

*Owen O'Riordan, Commissioner*

147 Hampshire Street  
Cambridge, MA 02139  
theworks@cambridgema.gov

Voice: 617 349 4800

TDD: 617 499 9924

September 22, 2022

Mr. Eric Worrall  
Regional Director, MassDEP  
Northeast Regional Office  
205B Lowell Street  
Wilmington, MA 01887

(via email)

RE: Schedule extension request for deliverables associated with the City of Cambridge's Updated CSO Control Plan for Combined Sewer Overflow (CSO) Discharges to the Charles River Basin and to the Alewife Brook/Upper Mystic River Basin

Dear Mr. Worrall,

In response to correspondence from the Massachusetts Department of Environmental Protection ("MassDEP") dated July 22, 2022, the City of Cambridge (Cambridge) formally requests a 36-month extension to the schedule for the deliverables associated with the Updated Combined Sewer Overflow (CSO) Control Plan for Cambridge's CSO outfalls. As provided for in your July 22, 2022 letter, we are attaching a Gantt chart, developed and agreed upon by Cambridge, the Massachusetts Water Resources Authority (MWRA), and the City of Somerville (Somerville), outlining the proposed amended schedule.

The substantial collaboration required to develop effective and useful Updated CSO Control Plans, that meets the requirements of MassDEP and EPA's conditions and clarifications, including a robust public participation plan are the primary reasons why we are requesting this extension to the current schedule. Cambridge currently meets bi-weekly with Somerville and MWRA to coordinate on major aspects our scopes of work. More detail on the anticipated level of effort and challenges driving the time required to effectively perform this work is discussed below:.

- Updating the Typical Year: Since March 2022, Cambridge, Somerville and the MWRA have been working to develop a typical year that not only reflects average rainfall and intensity in recent years, but considers the projected impacts of climate change on precipitation in the coming decades. Since Cambridge has been unable to find other examples where projected impacts of climate change have been incorporated into a Typical Year this effort is taking much longer than initially expected. Cambridge has

retained a consultant to conduct rigorous statistical analyses, as well as receive input from a climate expert at Cornell University to assist with developing the Typical Year. The time needed for a thorough analysis combined with the need for agreement by all three parties, public participation and ultimately review/acceptance by EPA is extensive. Lastly, having an updated Typical Year is required prior to beginning any alternatives analyses as part of the Updated CSO Control Plans.

- Alternatives Analysis: Each CSO control alternative will be evaluated using the updated Typical Year and unified model currently under development by Cambridge, Somerville and MWRA. An Alternatives Analysis is key to developing Updated CSO Control Plans and has been highlighted by the public as an important aspect of the public participation process. Giving the public an opportunity to provide meaningful input into the development, screening, and selection process of alternatives is expected to require three public meetings over the course of more than a year and a half. The extended time requested will allow for time before and between meetings to consider, prepare and provide meaningful responses and insight into public concerns and comments.
- Public Participation: The 2019 Variances state that Cambridge must develop a “public participation plan sufficient to provide for ample opportunities for the public to be informed about the development of the Plans at critical junctures, and to have opportunities to provide informed comments on the CSO abatement alternatives and recommendations”. EPA and MassDEP have stressed the importance of receiving public input at critical junctures during the Updated CSO Control Plan process and that the schedule allow sufficient time for consideration of public input prior to concluding decisions. This schedule request reflects Cambridge’s commitment to an enhanced public participation effort, essential coordination with Somerville and MWRA, and preparation of information for public review and comment in multiple languages aligned with the Environmental Justice communities potentially impacted by these Plans, and incorporation of feedback into the ongoing analysis.
- MEPA Review: The process to incorporate MEPA review for a planning process such as the Updated CSO Control plans is still in discussions with MEPA. Under consideration with the MEPA office, MassDEP, Cambridge, Somerville, and MWRA is the development of a Special Review Process (similar to the MEPA methodology used in the development of MWRA’s existing Long Term CSO Control Plan in the mid-1990s) for the Updated CSO Control Plans. It is still unclear how long the process will take. Based upon recent discussions with the MEPA office, Cambridge understands that some MEPA public outreach processes may be required to run concurrently with ongoing work for the development of the Updated CSO Control Plans and additional time may be needed once a draft plan has been proposed.

Mr. Eric Worrall, Regional Director, MassDEP  
September 22, 2022

RE: Schedule extension request for deliverables associated with the City of Cambridge's Updated CSO Control Plan for Combined Sewer Overflow (CSO) Discharges to the Charles River Basin and to the Alewife Brook/Upper Mystic River Basin

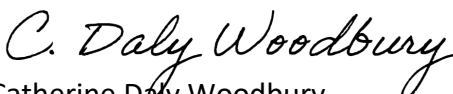
- Preparation of the Draft and Final Updated CSO Control Plans: Preparing both the draft and final Updated CSO Control Plans includes several months to internally coordinate the drafting of the reports, as well as time for Cambridge, Somerville and MWRA to review each other's reports, provide comments, and for those comments to be considered and any updates incorporated before each draft Updated CSO Control Plan is submitted to MassDEP and EPA. Both EPA and MassDEP have consistently stressed the importance of collaboration among Cambridge, Somerville and MWRA in developing Updated CSO Control Plans. Additional time beyond the original schedule is required to successfully meet this request and submit coordinated effective Updated CSO Control Plans.

Cambridge, in coordination with Somerville and MWRA, and our respective consultants, have concluded that the tasks described above will require an additional 36 months to complete, bringing the final adoption of individual Updated CSO Control Plans from December 31, 2023 to December 31, 2026. The existing Variances will expire on August 31, 2024, prior to the additional time needed to be fully responsive to MassDEP, EPA and the public. As a result, Cambridge is respectfully requesting that MassDEP consider taking steps that would support this extension request and ensure that Variances are in place for an appropriate period beyond the requested December 31, 2026 Final Updated CSO Control Plan submittals.

Cambridge appreciates MassDEPs support for the development of a common Updated CSO Control Plan. It is Cambridge's understanding that a common Updated CSO Control Plan is not unanimously supported by the three parties. Cambridge still believes that a common Updated Control plan would result in a superior, better integrated, consistent and a more sustainable Plan for the region. However, Cambridge is committed to continuing our collaborative work with Somerville and MWRA on the development of important aspects that are common and instrumental to the success of our efforts such as the integrated model, Typical Year, public outreach, evaluation of some alternatives, and schedule.

Thank you for your consideration of this request. If you have any questions, please contact me at [cwoodbury@cambridgema.gov](mailto:cwoodbury@cambridgema.gov) or 617-349-4818.

Sincerely,

  
Catherine Daly Woodbury  
Senior Project Manager

cc (all via Email):

Kathy Baskin, MassDEP  
Susannah King, MassDEP/NERO



Mr. Eric Worrall, Regional Director, MassDEP  
September 22, 2022

RE: Schedule extension request for deliverables associated with the City of Cambridge's Updated CSO Control Plan for  
Combined Sewer Overflow (CSO) Discharges to the Charles River Basin and to the Alewife Brook/Upper Mystic River Basin

Todd Borci, EPA  
Michael Wagner, EPA  
Jeff Kopf, EPA  
Kathy Watkins, City of Cambridge  
Jim Wilcox, City of Cambridge  
David Coppes, MWRA  
Brian L. Kubaska, MWRA  
Rich Raiche, City of Somerville  
Lucica Hiller, City of Somerville



