

CITY OF SOMERVILLE, MASSACHUSETTS
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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 or 617- 448-3716.

Sincerely,

Lucica Hiller

Lucica Hiller
Stormwater Program Manager, City of Somerville



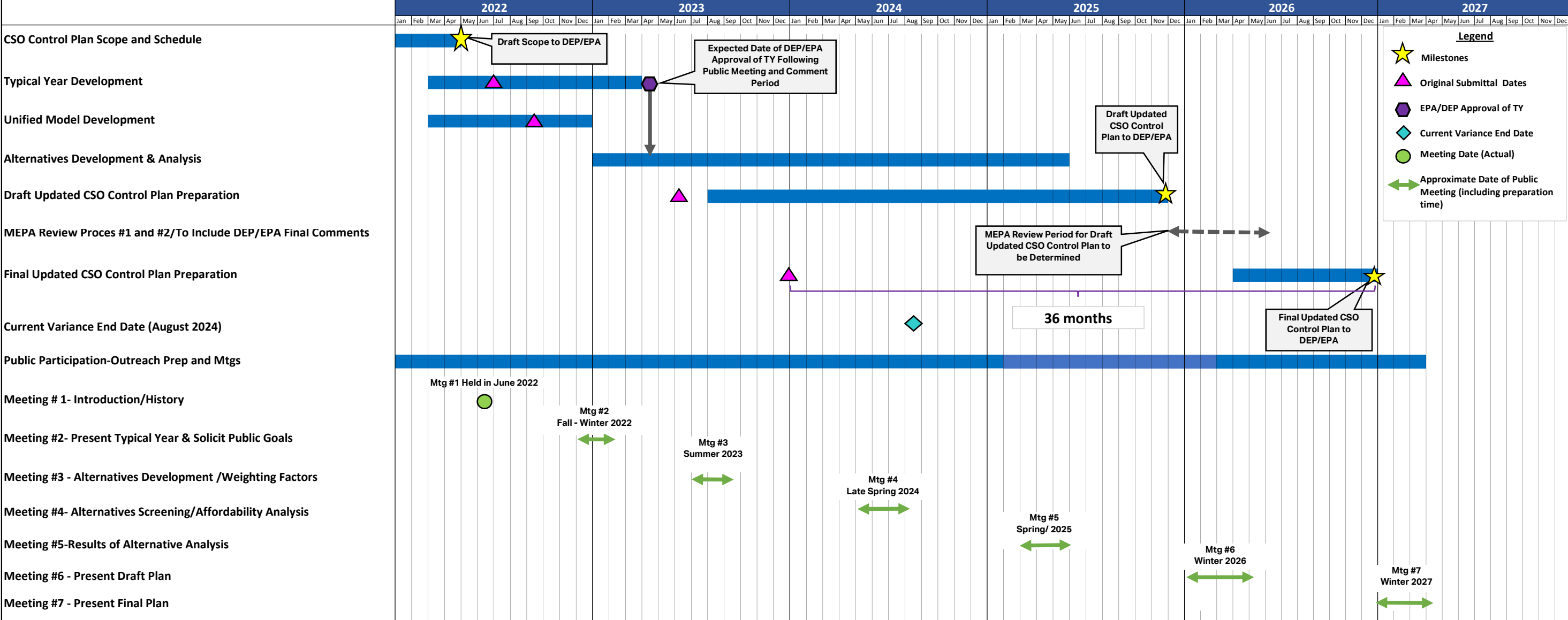


cc (all via Email):

Rich Raiche, City of Somerville
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Betsy Reilley, MWRA
Michael Altieri, MWRA
Brian L. Kubaska, MWRA
Kathy Watkins, City of Cambridge
Catherine Woodbury, City of Cambridge



Updated CSO Control Plan Schedule



Legend

- ★ Milestones
- ▲ Original Submittal Dates
- EPA/DEP Approval of TY
- ◆ Current Variance End Date
- Meeting Date (Actual)
- ↔ Approximate Date of Public Meeting (including preparation time)