



City of Cambridge  
Department of Public Works

*Owen O'Riordan, Commissioner*

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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.

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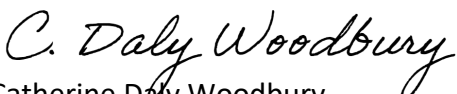
- Preparation of the Draft and Final Updated CSO Control Plans: Preparing both the draft and final Updated CSO Control Plans includes several months to internally coordinate the drafting of the reports, as well as time for Cambridge, Somerville and MWRA to review each other's reports, provide comments, 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 MassDEP's 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



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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



ATTACHMENT: Cambridge Updated CSO Control Plan Revised \_09.22.2022

