



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 Post Office Square
Boston, MA 02109-3912**

May 23, 2023

David Coppes
Chief Operating Officer
Massachusetts Water Resources Authority
Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Richard Raiche
Director of Infrastructure and Assets
City of Somerville
93 Highland Ave.
Somerville, MA 02143

Catherine Woodbury
Senior Project Manager
Department of Public Works
147 Hampshire Street
City of Cambridge
Cambridge, MA 02139

Re: MWRA, Somerville, and Cambridge Typical Year Development

Dear Mr. Coppes, Mr. Raiche, and Ms. Woodbury:

EPA has reviewed the information provided to date regarding the development of a “Typical Year” by the Massachusetts Water Resources Authority (“MWRA”), the City of Somerville, and the City of Cambridge. As you know, updated Combined Sewer Overflow (“CSO”) Long Term Control Plans are being developed in accordance with requirements of the 2019 Variances for CSO Discharges to the Alewife Brook/Upper Mystic River Basin and the Lower Charles River/Charles Basin. Development of a “Typical Year” is a standard step during this process and provides a measurement tool that is then used to develop alternatives to reduce CSO discharges.

Considering the information provided to date, and subsequent discussions between EPA, the Massachusetts Department of Environmental Protection (“MassDEP”), MWRA, the City of Cambridge, and the City of Somerville, EPA recognizes the significant time and effort undertaken by the parties to incorporate into the development process meaningful public input

and the appropriate realities of climate change as requested by EPA and MassDEP.

Based on our review, the Typical Year as proposed meets existing EPA CSO guidance and policies^{1,2,3,4}. While EPA believes MWRA, Cambridge, and Somerville should move ahead with the revised Typical Year as proposed, it is clear that climate science will continue to develop, and EPA encourages the parties to include in the draft Updated CSO Long Term Control Plan a determination as to whether the state of climate science and state and federal regulatory policy at that time warrants any revisions to the Typical Year.

Thank you in advance for your consideration of these issues. Please contact feel free to contact me (617-543-9438 or borci.todd@epa.gov) if you have further questions.

Sincerely,

Todd Borci, Manager
Water Technical Unit 1
Enforcement and Compliance Assurance Division
US EPA Region 1

cc: Kathy Baskin/MassDEP
Eric Worrall/MassDEP
Michael Wagner/EPA
Jeff Kopf/EPA
Ken Moraff/EPA

¹ https://www.epa.gov/sites/default/files/2015-10/documents/sewer_0.pdf

² https://www.epa.gov/sites/default/files/2015-10/documents/owm0272_0.pdf

³ <https://www.epa.gov/enforcement/framework-protecting-public-and-private-investment-clean-water-act-enforcement-remedies>

⁴ https://www3.epa.gov/npdes/pubs/wqs_guide_fact_sheet.pdf