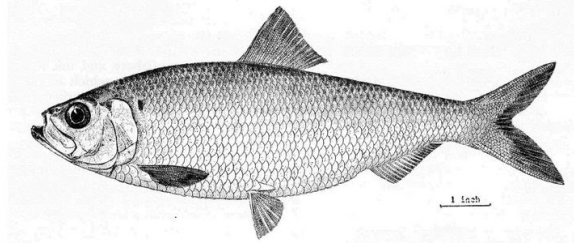


Save the Alewife Brook



Environmental Health is Community Health

November 21, 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,

Thank you for your continued efforts at environmental stewardship. Save the Alewife Brook is a grassroots environmental group with supporters in the communities along the Alewife Brook, including Somerville, Cambridge, Arlington, Belmont, and Medford. We formed our organization to raise awareness about the unsafe condition of the Brook, and to advocate for an end to combined sewer discharges. We envision a Brook that is safe to live near, an environmentally healthy community resource rather than a hazardous overflow sewer.

We write to you regarding the September 22, 2022, requests from Cambridge, Somerville, and MWRA for a 36-month deadline extension for their completion of the new CSO Long-Term Control Plan (LTCP).

As a preliminary matter, we are concerned that we were not copied on the letters from Cambridge, Somerville, and MWRA to you. For some time, we have engaged with the applicants on Alewife Brook CSOs and with the regulatory agencies on the CSO LTCP. We ask that you require Cambridge, Somerville, and MWRA to copy us in any correspondence concerning Alewife Brook and the new CSO LTCP, and that you also copy us on your correspondence with them on the matter. To do otherwise would be to limit public involvement in this important issue.

We don't believe that the CSO parties have made a strong enough case for the requested three-year extension without taking immediate action. Nonetheless, if you determine that an extension is necessary, there are factors cited by the parties that have our support:

1. Including Climate Change projections in the typical year modeling used for CSO infrastructure planning and performance evaluation.
2. More extensive alternatives analysis.
3. Increased public participation with additional meetings.
4. MEPA Review.
5. Cambridge, Somerville, and MWRA preparing a common Updated Alewife CSO Control Plan.

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Typical Year

We are particularly concerned about the Typical Year model used to evaluate alternatives and performance. The model must reflect not only recent rainfall, but also climate change projections, accounting for the increased intensity and frequency of larger storm events. Also, CSO discharges increase in a nonlinear fashion with large storm events. Thus, the analysis needs to consider not just a “typical” year but also larger, less frequent storm events. This is standard practice for stormwater designs, which are based typically on 10 and 100-year storm events.¹

Cambridge, Somerville and MWRA should create a common Alewife CSO Control Plan because it would allow for better CSO control, taking into account the entire sewer system, regardless of municipal boundaries and infrastructure ownership. Modern “Smart Cities” solutions could be employed using a common Control Plan, by, for instance, using a Model Predictive Control systems solution for CSO control².

We recognize that more time may produce a better plan, but this extension represents a further delay in addressing CSO sewage pollution issues. Completion of the new CSO Control Plan would be delayed from December 2023 to December 2026. This extension period also pushes forward a decade or more actual implementation of CSO Control. The threat of sewage-contaminated flooding that is exacerbated yearly by Climate Change makes four years too long for affected Environmental Justice populations to wait for improvements.

Impact of the Schedule Extension on the Variance

There is one part of the MWRA request that we strongly oppose - the recommendation that “Variances in support of this request should merely provide a time extension, and not result in additional variance conditions.” We trust that MassDEP will reject this request.

MWRA's current CSO Control Plan recommended untreated discharges to the Alewife Brook comparable to the load for the entire Charles River. MWRA argued for “phased implementation” of controls based on potential cost savings. After 20 years of delay, having failed to achieve the required level of CSO control, they are asking for additional time, during which they recommend that the minimal burdens of the prior variances *that they requested* be lifted. The public rightly expects that Alewife Brook will receive resources in proportion to the scale of the problem that exists here — resources to fund ongoing work to maintain compliance with the federal water quality standard regulations to which dischargers are to be held during the term of a Variance.

¹ See for example Standard 2 of the Massachusetts Stormwater Management Standards.

<https://www.mass.gov/guides/massachusetts-stormwater-handbook-and-stormwater-standards#-stormwater-handbook-volume-1->

² See “[Model predictive control based on artificial intelligence and EPA-SWMM model to reduce CSOs impacts in sewer systems](#)”

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Immediate Actions

We would like to see immediate action taken to address the problems of the Alewife Brook while the new control plan is being developed.

We request that Cambridge, Somerville, and MWRA fund the updating of the Metropolitan District Commission 2003 Alewife Master Plan.³ Specifically, we would like an **Alewife Master Plan update** to be completed in 2023. The updated Alewife Master Plan should look at river restoration and dredging as envisaged in the 2003 Alewife Master Plan. It should also consider the recommendations in the EPA⁴ technical analysis. The scope should encompass Alewife Brook from the Alewife T Station to the Mystic River.

An updated 2023 Alewife Master Plan is essential for timely application for Federal Infrastructure Law funds to address flooding and water quality issues, increasing Climate Resilience and mitigating negative impacts on the area's Environmental Justice populations. An updated Alewife Master Plan would also help in developing the new Long-Term CSO Control Plan.

We hope that DEP and the applicants will take all these factors into account to produce a more comprehensive and inclusive plan.

Sincerely,

Kristin Anderson David White Gwendolyn Speeth David Stoff

Kristin Anderson, David White, Gwendolyn Speeth, David Stoff

Save the Alewife Brook

cc:

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
David Coppes, MWRA

Kathy Watkins, City of Cambridge
Catherine Daly Woodbury, City of Cambridge
Rich Raiche, City of Somerville
Lucica Hiller, City of Somerville
Brian Postlewaite, City of Somerville
Peter Shelley, Conservation Law Foundation
Patrick Herron, Mystic River Watershed Association
Emily Norton, Charles River Watershed Association
Stephen Nutter, Green Cambridge
Mike Nakagawa, Alewife Study Group
Greg Harris, Friends of Alewife Reservation

³ See: [https://www.mass.gov/guides/dcr-master-plans#-alewife-master-plan-\(2003\)-](https://www.mass.gov/guides/dcr-master-plans#-alewife-master-plan-(2003)-)

⁴ EPA's May 11, 2022 CSO Control Plan guidance letter for MWRA, Section 4 – Alternatives Development and Evaluation.