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## COMMENTS ON CSO VARIANCE TENTATIVE DETERMINATION

To: Martin J. Suuberg, Commissioner, MassDEP

Date: July 25<sup>th</sup>, 2019

### Subject: Comments on CSO Variance Tentative Determination

Dear Commissioner Suuberg,

The City of Somerville supports allowing the 5-year variance on the Combined Sewer Overflow (CSO) discharges to the Alewife Brook/Upper Mystic River and appreciates the opportunity to comment on the CSO Variance Tentative Determination. The following are our comments on the Alewife Brook/Upper Mystic River Basin Tentative Determination:

- Page 5, Section D(4)(a): The City of Somerville is comfortable with the provisions proposed for the CSO Alert Notification system as long as it is understood that the information to be provided in the Alert Notification will be automated and that time constraints of the notification proposed will not allow for any data verification nor customization of the information for each CSO Alert.
- Page 6, Section D(4)(b): Somerville has had discussions with vendors and has concerns related to the accuracy of volume estimates available within a five day timeframe. We understand and support the need to provide this information in a timely manner, but are skeptical that the technical issues can be adequately addressed by Dec 31<sup>st</sup>, 2020.
- Page 7, Section F: We propose that MWRA, Somerville, and Cambridge submit one collaborative CSO Plan instead of three individual CSO Control Plans. From a practical standpoint, the three systems interact making it impossible to evaluate the benefits of mitigation measures in isolation. Moreover, it is in the best interest of the regional rate payers to define an integrated plan. The management of the CSOs are already a collaborative effort and we propose that this be represented in a single Plan.
- Page 7, Section F: Given the timeframe of the sampling period and reporting deadline of December 31<sup>st</sup>, 2021 we would propose that the submittal of the CSO Control Plan(s) scope and schedule to be delayed until June 30<sup>th</sup>, 2022 from April 1<sup>st</sup>, 2022 to allow for a more realistic timeframe for Cambridge, Somerville and MWRA to develop an Plan and the specific items each party will lead.





- Page 7, Section F(5): Evaluation of options and development of preferred mitigation measures is anticipated to be a technical challenge and will require significant public input from both Cambridge and Somerville constituents. We recommend a minimum of two years from the date of MassDEP and EPA approval of the scope of work for the preparation of a draft report.
- Page 7, Section F(6): Similarly, finalization of the plan will require technical analysis, public involvement, and agreement between Cambridge, Somerville and MWRA on plan implementation specifics. We recommend a minimum of six months from the time of MassDEP and EPA comments on the Draft Report to the submission of the Final Report.

The City of Somerville supports the allowance of the variance and looks forward to continued collaboration on these important endeavors.

Respectfully,

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