



Purvi Patel
Environmental Analyst, MEPA Office
Executive Office of Energy and Environmental Affairs
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Re: XMBLY Notice of Project Change, EEA #15595

October 13, 2020

Dear Ms. Patel:

Thank you for the opportunity to comment on the NPC for this important project, which we understand will have a significant impact on the wastewater management system in Somerville as well as other Mystic River watershed communities.

The Mystic River Watershed Association (MyRWA) was founded in 1972 to protect and restore the river, its tributaries, and watershed lands, spanning 21 municipalities including Somerville, for the benefit of present and future generations. As part of this work, our organization has a powerful focus on climate resiliency and the risks of increasing flooding, sewage pollution, and other impacts as climate disruption manifests on our communities.

The proponents indicate in their NPC that the project change will result in additional 35,800 gallons per day of wastewater discharge from their expanded facility, a substantial increase of 23% above that indicated in their initial filing. Wastewater management in Somerville plays a pivotal role in controlling sewage pollution in the Mystic River Watershed because of the status of the Somerville Marginal facility and its combined sewer overflow (CSO) outfalls. The most recent disclosure from MWRA reports that this facility discharged 27 times during 2019, contributing more than 97 million gallons of sewage to the Mystic River. This CSO discharge endangers human and ecological health in downstream communities with large environmental justice populations such as Chelsea, Everett and Revere.

The addition of a further 35,800 gallons per day of wastewater to the Somerville system has the alarming potential to exacerbate the burden of pollution from CSO discharges on downstream communities and environmental justice populations.

We understand that the proponent will be required to pay a mitigation fee of \$14.35 per gallon towards reduction of inflow and infiltration (I/I), or cause the removal of at least 4 gallons of I/I flow per gallon of new wastewater generated, in the Somerville system. The proponents address this necessity in their filing by stating "The Proponent will work closely with the City to determine the I/I mitigation for the Proposed Project through the local permitting processes," but it seems that the selection of a mitigation project or the designation of mitigation fee funds has not yet been identified.

We ask that the environmental and public health burden associated with the proponent's dramatic increase in proposed wastewater discharge be given acute attention during the

MEPA review process, and that I/I mitigation efforts required of the proponent be focused on the drainage to the Somerville Marginal facility so that it may reduce the discharge volume of its CSO outfalls.

Thank you again for the opportunity to comment on this important development.

Sincerely,

A handwritten signature in black ink that reads "Patrick Herron". The signature is written in a cursive style with a large initial "P" and a stylized "H".

Patrick Herron
Executive Director, Mystic River Watershed Association