



Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs

Department of Environmental Protection

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Maura T. Healey
Governor

Kim Driscoll
Lieutenant Governor

Rebecca Tepper
Secretary

Bonnie Heiple
Commissioner

November 17, 2025

Fred Laskey, Executive Director
Massachusetts Water Resources Authority
Charlestown Navy Yard, Building 39
100 First Avenue
Boston, MA 02129

Yi-An Huang, City Manager
City of Cambridge
795 Massachusetts Avenue
Cambridge, MA 02139

The Honorable Katjana Ballantyne, Mayor
City of Somerville
93 Highland Avenue
Somerville, MA 02143

Re: MWRA/Cambridge/Somerville Updated CSO Control Plan

Dear Mr. Laskey, Mr. Huang, and Mayor Ballantyne:

Massachusetts Department of Environmental Protection (MassDEP) staff virtually attended the October 29, 2025 Massachusetts Water Resources Authority (MWRA) Board of Directors meeting, which focused on the collective efforts of MWRA and the Cities of Cambridge and Somerville to develop a Draft Updated Combined Sewer Overflow (CSO) Control Plan. As you know, the development of a Draft and Final Updated CSO Control Plan is a requirement of the Water Quality Standards Variances issued by MassDEP to MWRA and the Cities of Cambridge and Somerville on August 30, 2024.

Based on the information presented at the October 29 meeting, MassDEP is concerned that Recommended Alternatives identified may be insufficient to address CSO discharges and associated impacts. In particular, an approach that would result in a greater number of activations and/or volumes than occur at present would not appear to be consistent with the federal Clean Water Act or the Massachusetts Surface Water Quality Standards, which are intended to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” 33 U.S.C. 1251(a); 314 CMR 4.01(3).

While MassDEP understands that the information presented at the October 29 MWRA Board Meeting is preliminary, considerable time and resources will be invested by MWRA and the Cities of Cambridge and Somerville, their respective approving authorities, state and federal regulators, and stakeholders to complete a Final Updated CSO Control Plan over a number of years. Accordingly, to ensure a productive process, MassDEP urges MWRA and the Cities to reevaluate the alternatives and reconsider their respective recommendations at this time. Submitting a Draft Plan that satisfies state and federal standards by achieving the highest feasible level of CSO control will provide a solid starting point for the multi-year process to follow.

We understand that reconsidering alternatives may require additional work and collaboration amongst the three permittees. If MWRA and the Cities of Cambridge and Somerville require additional time beyond the December 31, 2025, deadline, please notify MassDEP in writing and provide a reasonable timeline (e.g., 30 additional days) to complete and submit the Draft Plan.

If you have any questions regarding this matter, feel free to contact me at kathleen.baskin@mass.gov or (781) 686-5946.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen M Baskin".

Kathleen Baskin
Assistant Commissioner, Bureau of Water Resources

Cc: Todd Borci, USEPA
Ken Moraff, USEPA
Eric Worrall, Regional Director, MassDEP Northeast Regional Office
Kathy Murtagh, MWRA
Brian Kubaska, MWRA
Richard Raiche, City of Somerville
Lucica Hiller, City of Cambridge