



FOLEY
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MWRA Affordability Demonstration

John M. Stevens

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Thursday, November 8, 2007





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

**JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001**

February 27, 1998

. . . EPA concurs . . . that further CSO controls . . . would cause substantial and widespread economic and social impact.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. DeVillars", is written over the typed name.

John P. DeVillars
Regional Administrator

Potential Disasters

- Prosperity
- Efficiency

Assessment of the Economic Impact of Additional Combined Sewer Overflow Controls in the Massachusetts Water Resources Authority Service Area

By

ROBERT N. STAVINS, GENIA LONG, JUDSON JAFFEE
Analysis Group, Inc.

August 1, 2004

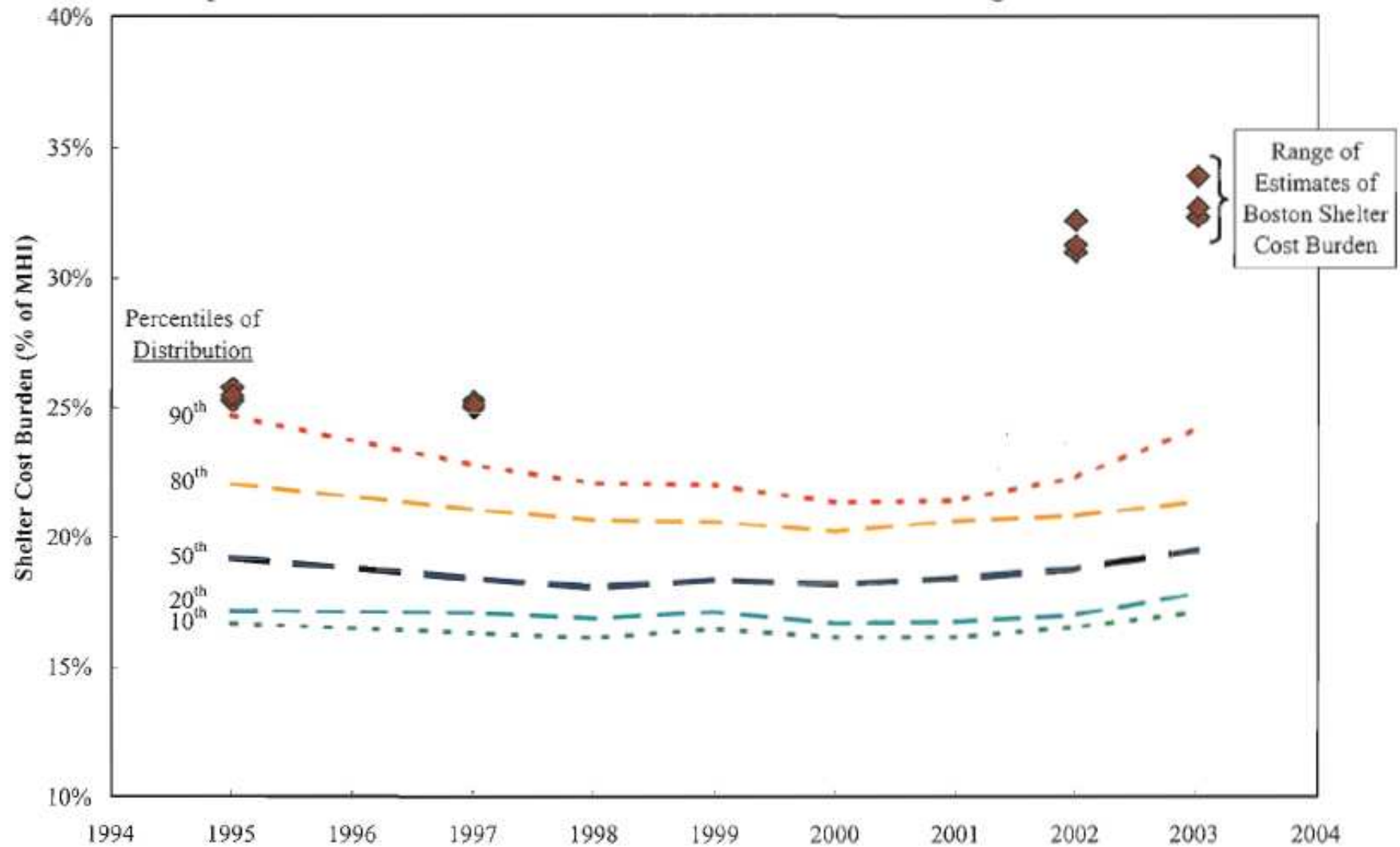
1.4. Summary of findings

The analyses presented below validate EPA's 1998 finding that, by 2005, conditions in the MWRA service area will be such that additional CSO controls would cause "substantial and widespread economic and social impact." Indeed, by examining economic burdens on households that include the cost of basic necessities, we find that the MWRA service area already bears economic burdens well above those typically associated with a preliminary screener value that indicates a "large" economic impact. In particular, our analysis focuses on the shelter cost burden, which serves as a proxy for the burden from the cost of all basic necessities.

Economic burdens in Boston and Chelsea are especially severe. In 2003, actual shelter cost burdens in both cities were near the maximum burden that any of the sample of 80 metropolitan areas examined in our analysis *would experience* if their sewer charges rose to the point of meeting EPA's 2% screener threshold.

Figure 5

**Shelter Cost Burden in the City of Boston
Compared with the Nationwide Distribution Associated with Meeting EPA 2% Threshold**



MEMORANDUM OF THE UNITED STATES OF AMERICA IN
SUPPORT OF JOINT MOTION TO AMEND SCHEDULE SIX
WITH RESPECT TO THE CHARLES RIVER, ALEWIFE
BROOK, AND EAST BOSTON

³ Federal regulations allow for variances or changes in water quality standards where meeting standards would cause substantial and widespread economic and social impact. See 40 C.F.R. § 131.10(g). As indicated in letters between them exchanged in March 2006, the EPA and the DEP have concluded that requiring the MWRA to eliminate all overflows prior to 2020 would cause substantial and widespread economic and social impact.

. . . . DEP has agreed to issue to the MWRA, and the United States Environmental Protection Agency (EPA) has agreed to approve, 5 consecutive variances of up to three years' duration each of the mandated water quality standards for the Charles River and Alewife Brook/Upper Mystic River. The variances will be granted through the year 2020, and will require the MWRA to comply with the CSO milestones and levels of control referenced in Schedule Six as amended.

SO ORDERED.

Richard G. Stearns
UNITED STATES DISTRICT JUDGE

Figure 3. CSO Discharge Volumes are Diminishing

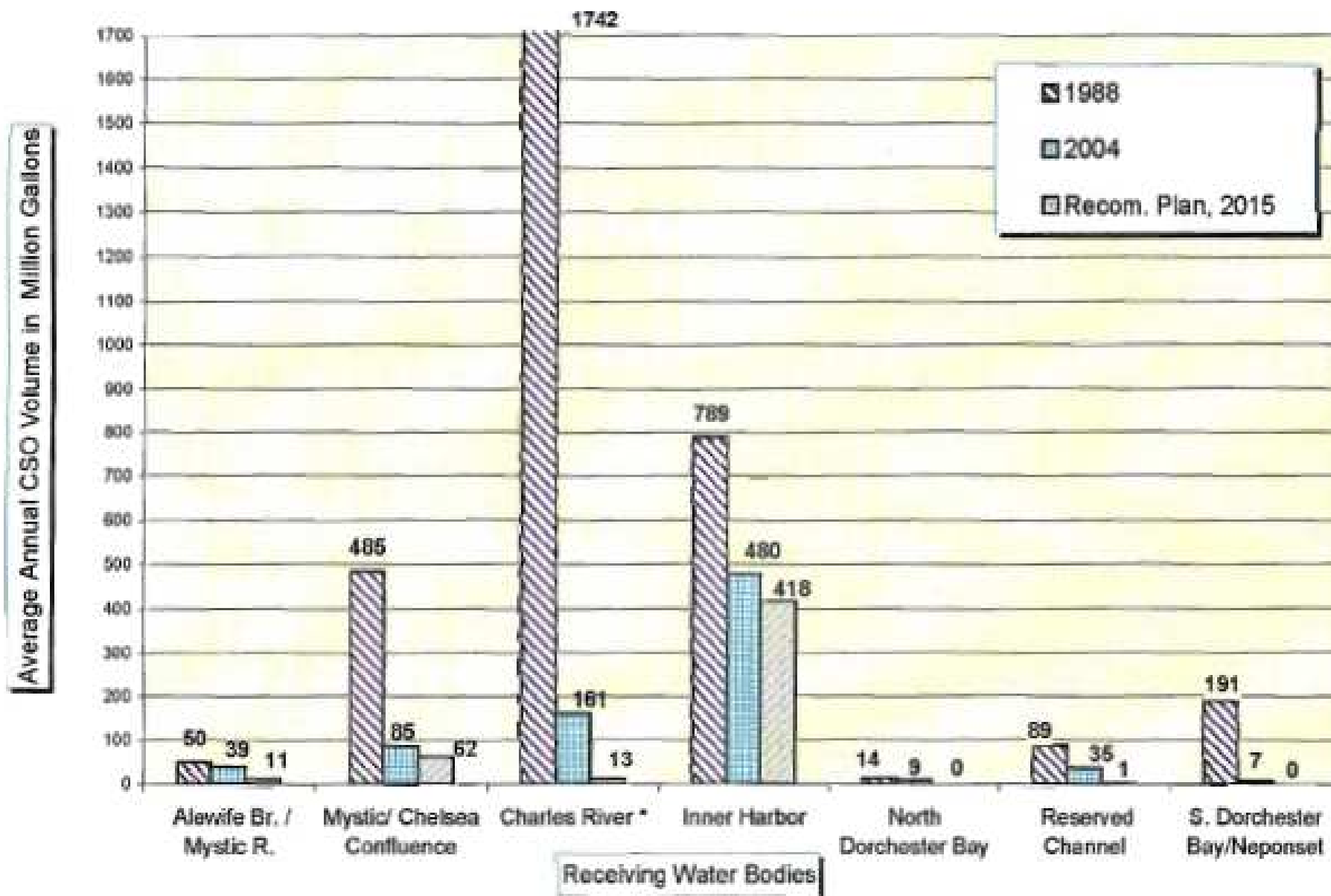




Table 1. CSO Project Cost Estimates

Project	Conceptual Plan (Dec. 1994)	Fac. Plan/EIR (Aug. 1997)	Current Budget (1)	Proposed Budget (2)	Status
Cottage Farm CSO Controls (3)			0.8	6.0	Design start 9/06
Brookline Sewer Separation (3)				9.0	Design start 11/06
Bulfinch Triangle Sewer Separation (3)				4.0	Design start 11/06
Total CSO Program	\$397.8M	\$487.0M	\$755.8M	\$783.6M	

(1) From MWRA approved FY 06 Capital Improvement Program

(2) From MWRA proposed FY 07 Capital Improvement Program

(3) Proposed in recent agreement with DEP, EPA, and DOJ for long-term CSO Control and proposed to be added to Court Order



Lessons from MWRA Experience

- Do not be deterred by screener
- Deviate as little as possible
- Apply based on achievement
- Agree to do more
- Be prepared to draw a line