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## MEMORANDUM

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TO: Mr. Ray Cody, EPA Region 1

FROM: Richard A. Claytor, Jr., P.E.

DATE: September 30, 2011

RE: Sustainable Stormwater Funding Evaluation for the Upper Charles River  
Report Transmittal Topics

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Mr. Ray Cody,

As you know, we completed a draft report in late August 2011 on the above referenced project. On September 12, 2011 we conducted a briefing as part of our 4<sup>th</sup> meeting with the Project Steering Committee. At that time we solicited feedback on the draft report and requested that any written comments be submitted by Monday September 19, 2011. We received verbal comments during a separate meeting with Town of Franklin personnel (also held on 9/12/11), email correspondence from Don DiMartino with the Town of Bellingham, written comments from Mike Santora with the Town of Milford, and written comments by letter jointly from the 495/MetroWest Partnership, AIM and NAIOP. These comments have been added to the prior comments included in Appendix A of the final report. Unless specifically noted below, the comments received resulted in changes and/or additions in the final report. The following summarizes the major changes to the final report as a result of the comments received.

### Significant Changes and/or Additions to the Final Report

The following key items were changed as a consequence of comments received on the draft report.

- Total implementation costs were added to both Section 6 (Funding Options) and the Executive Summary. These costs are presented for a 25-year period for each of the four implementation options (10, 15, 20, 25 years) and include all anticipated costs (annual

operational costs, capital expenditures, billing, BMP maintenance on capital projects, inflation, and loan interest).

- The assumed bond interest rate was revised to 4.0%.
- An evaluation of the required rate structure for only those properties within the Charles River Watershed was added as an appendix (refer to Appendix F).
- Additional information and detail was included related to the topic of fee “Credits” within Section 6 (Funding Options) related to what type of property would be eligible for credits and the implications of granting credits.
- Additional discussion was added related to the estimated value for an equivalent residential unit (ERU) to clarify how these ERUs were calculated and how they will need to be revisited at the Stormwater Utility implementation stage.
- The recommendations to consider a longer timeframe for implementation and to consider a “back-end-loaded” implementation schedule were changed to broaden the recommendation beyond just that directed at the communities.
- The recommendation to implement a public education and engagement program was expanded to emphasize the importance of this topic.
- The language in Section 8 (Recommendations and Next Steps) related to watershed planning and assessment was revised to broaden the extent of what area might be included in a watershed management plan and to tie this back to the need to identify appropriate project locations in order to better quantify future implementation costs.

#### Comments Considered That Did Not Directly Result in Changes from the Draft Report

- The comment to describe any margin of error or indicate the range of total future costs was not specifically addressed. The draft and final reports both included data and information indicating a possible range in capital costs associated with one method (refer to Section 4.2.2.2) and contain several figures indicating a potential range. The methods used to derive the estimated costs did not use statistical data to derive a margin of error and therefore one could not be developed. The assumptions and sources of data are documented in Section 4.2 and Section 6.
- A recommendation to implement a monitoring strategy more locally to the Upper Charles River was not addressed specifically in the report. However, the discussions related to watershed planning and management (Section 8.1) and the operational cost assumptions (Section 4.2) address the need to conduct monitoring at an appropriate scale and location. In addition, the recommendations (Section 8 and Executive Summary) call for the periodic evaluation of results to help quantify the load reductions achieved.
- The comment to include copies of the presentations from the Steering Committee meetings was considered by the Project Team. The Steering Committee presentations were developed as interim products for the review and comment by the Steering Committee and not representative of the final assessment. In addition, these

presentations are available electronically at the same source as the final report. Including these presentations was deemed to be redundant and inappropriate for the final report.

- There were several comments related to the recommendations for more specific direction. (e.g., who might fund the development of a watershed plan? or who might fund a public education and involvement project? or who should conduct a poll of the designated discharger properties?). The Project Team carefully considered these questions and agrees that the answers would be important in executing the next steps towards implementation. However, the Project Team felt deriving answers to these questions was beyond the scope of the feasibility study and that it is ultimately the responsibility of those involved in the next phases to address these questions.