



## Northern Middlesex Council of Governments

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March 24, 2025

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs  
Attention: MEPA Office  
Alexander Strycky: EOEEA #16928  
100 Cambridge Street, Suite 900  
Boston, MA 02114-2509

Re: EOEEA MEPA #16928 - Centralville Sewer Separation, Lowell, Expanded Environmental Notification Form (EENF)

Dear Secretary Tepper,

The Northern Middlesex Council of Governments (NMCOG) appreciates the opportunity to comment on the Expanded Environmental Notification Form (EENF) for the Centralville Sewer Separation Project filed by the City of Lowell Regional Wastewater Utility. As a regional planning agency, NMCOG evaluates MEPA proposals to determine their regional impact and alignment with planning initiatives that support environmental sustainability, public health, and infrastructure resilience.

The Centralville Sewer Separation Program is a multi-year construction project spanning 400 acres of sewer separation and 7+ miles of new drains, sewers, and water. The separation is required by the Consent Decree from the Environmental Protection Agency and Massachusetts Department of Environmental Protection to reduce combined sewer overflow (CSO) volume. The project benefits include reducing sewer backups; reducing street flooding; installing new infrastructure with an extended lifespan, and improving roadways.

This EENF comprises Phases 1, 2A, and 2B, involving the installation of approximately 42,000 linear feet of new stormwater drainpipe within existing city streets. The project includes two new outfalls to the Merrimack River, requiring crossings of the VFW Highway, the U.S. Army Corps of Engineers flood protection levee, and the Massachusetts Department of Conservation and Recreation's (DCR) multi-use trail parallel to the river. Additionally, the project involves the renewal and relocation of sewer, water, and gas utilities, improvements to traffic safety and pedestrian access, and restoration of pavement, sidewalks, and curbs. The Phase 3 Candidate Areas Sewer Separation Program includes three projects—Grand/School Street/Inland Street, Lower Saunders, and Pevey. These three projects address long-standing flooding issues along the Marginal Interceptor and will install approximately 14,600 linear feet of new drains with three new outfalls to the Pawtucket Canal, requiring crossings of DCR-owned land.

Sewer separation is critical to improving water quality in the Merrimack River by reducing CSOs and sanitary sewer overflows (SSOs). The project directly supports Massachusetts' commitment to clean water initiatives and enhances public health by reducing stormwater contamination. The project

incorporates Complete Streets principles to ensure that roads accommodate all users, including pedestrians and cyclists. Restoration of sidewalks and curbs will significantly improve pedestrian access and safety. Replacement of 6,600 linear feet of aging water mains will improve water service reliability. The installation of 4,800 linear feet of new sewer pipe and rehabilitation of 1,700 linear feet using cured-in-place lining will extend the longevity of the new infrastructure.

Given the importance and complexity of this project, NMCOG recommends following Lowell Regional Wastewater Utility's plan of communication and coordination with residents. NMCOG also recommends coordination and communication with all roadway users, businesses, and other institutions in the impacted areas. A robust public communication plan should include real-time project updates, detour maps, and community engagement meetings

During construction, NMCOG recommends the management and control of the following: traffic coordination; emergency access routes; traffic detours; noise and dust, and sedimentation. Due diligence reviews and proper disposal of contaminated materials, including asbestos pipe removal where necessary, should be conducted to ensure environmental safety.

NMCOG fully supports the Centralville Sewer Separation Project given its direct benefits to water quality, public health, and infrastructure resilience. We commend the City of Lowell and Lowell Regional Wastewater Utility for advancing this critical project and urge MEPA to facilitate an efficient review process to enable timely implementation. We appreciate the opportunity to provide these comments and look forward to continued collaboration.

Should you have any questions regarding these comments, please contact Meghan Tenhoff, Principal Planner - Sustainability, at [mtenhoff@nmcog.org](mailto:mtenhoff@nmcog.org).

Sincerely,



Jennifer Raitt  
Executive Director

cc: Thomas A. Golden Jr., Lowell City Manager