



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

June 23, 2023


TO: Select Board

RE: Wildwood School Massachusetts School Building Authority (MSBA) Project

The Wildwood School Building Committee (WSBC) met on June 21st with representatives from Dore + Whittier, project designer, and SMMA, the Owners Project Manager (OPM). The purpose of the meeting was to fulfill the plan that was established at the joint meeting of the Select Board, School Committee, Finance Committee and WSBC on May 17th. At the time discussion centered around the prospect of expanding the number of grade configuration options to be considered and to seek approval from the Massachusetts School Building Authority (MSBA) to do so. The idea was that presentations would be made to each committee with the expectation that the committees would vote on whether to endorse seeking permission from the MSBA to expand the grade configuration options.

Members of the WSBC were briefed that each of the other three (3) committees had voted to stay the course and focus on studying pre-kindergarten to kindergarten, a pre-kindergarten to grade 3 and a pre-kindergarten to grade 5 options. Committee members were advised that MSBA places a great deal of importance on the community maintaining consensus amongst its governing boards as it proceeds through their process and that even if the WSBC voted to support expanding the options it would be ill advised to make such a request. In light of these points, Committee members decided to forego the Dore + Whittier presentation detailing the districtwide option. The vote of the WSBC was to proceed with the existing three options which were part of the original statement of interest (SOI). Julie Leduc, from SMMA, will convey to representatives from the MSBA that Town will stay the course.

The remaining discussion focused on a presentation from Dore + Whittier about next steps which include establishing four (4) visioning sessions and scheduling multiple public forums with the purpose of receiving feedback on the type of facility and campus the town is seeking from an academic, building design and community center standpoint. The expectation is to continue meetings of the WSBC on Wednesday evenings with no meeting in July. The visioning and public forums are expected to kick-off in mid to late September.


Jeffrey M. Hull
Town Manager



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

June 23, 2023

TO: Select Board

RE: Request for Massachusetts Department of Transportation (MassDOT)
to Restripe a Portion of Route 38

Massachusetts Department of Transportation (MassDOT) District 4 Area Supervisor Alex Niles was contacted about expediting striping along Route 38. The target area is between Market Basket Plaza and Route 62. Mr. Niles advised that the department is extremely backed up with line painting projects but will attempt to expedite the request. He was not able to offer a specific time frame when the work could be completed.


Jeffrey M. Hull
Town Manager



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

June 23, 2023

TO: Select Board

RE: Affordable Housing

At the Board's meeting on June 12, 2023 a request was made to invite Planning and Conservation Director Valerie Gingrich to a future meeting to discuss "tools" that are available to promote additional affordable housing in Wilmington. While the Town's Subsidized Housing Inventory (SHI) currently exceeds the 10% threshold, the desire is to create an additional buffer to reduce the prospect that the number of affordable housing units will fall below that threshold in the future.

Director Gingrich has indicated she will be prepared to meet with the Select Board at one of your September meetings to discuss different avenues to promote affordable housing and to ensure that the percentage remains above the 10% threshold.

Jeffrey M. Hull
Town Manager



Town of Wilmington
Office of the Town Manager
121 Glen Road
Wilmington, MA 01887-3597

PHONE: (978) 658-3311
FAX: (978) 658-3334
TTY: (978) 694-1417

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June 22, 2023

Gary DePalma, Chairman
Wilmington Select Board
Town Hall
121 Glen Road
Wilmington, MA 01887

Chairman DePalma,

This communication serves to notify the Select Board of my intention to retire from the position of Town Manager effective at the close of business on Tuesday, October 31, 2023. Section 3 – Termination and Severance Pay, subsection B of the Employment Agreement between the Board and me requires that at least sixty (60) calendar days of notice be provided in advance of my leaving employment. By providing written notice one hundred thirty-one (131) days in advance the Board will have adequate time to provide for my replacement.

It has been an honor to serve the residents of the Town of Wilmington. I have been privileged to work with many talented, hard working and carrying employees and volunteers over the years, all of whom have been committed to Wilmington's success.

Over the next four (4) months I will endeavor to make the transition as smooth as possible.

Sincerely,

Jeffrey M. Hull
Town Manager

cc. Select Board
Susan Inman, Assistant Town Manager/Human Resources Director



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

June 23, 2023

TO: Select Board

RE: Considerations for Town Manager Recruitment

Common steps in a Town Manager/Administrator hiring process, whether conducted in-house or by hiring a recruiter, are reflected below. These dates are suggestions only and contemplate that the Board conduct at least one meeting outside of its summer meeting schedule.

<u>July 10</u>	Create a timeline, professional advertisement, position profile and confirm recruitment process with Select Board. Agree on advertisement sources. Board to confirm a recruitment plan and professional announcement.
<u>July 17</u>	Develop position brochure and screening committee charge for the Board to review. Board adopts charge for committee. Appointment of a screening committee (commonly made up of department heads, citizens, key committee members)
July 25 (wk of)	Place advertisements for position and start recruiting candidates.
<u>August 29</u>	Deadline for resumes, resumes are forwarded to screening committee members at the end of the submission period.
September 6 – September 20	Screening committee completes review of resumes, interviews candidates, conducts background reviews, due diligence, etc. Narrows field to 8-10 candidates for further consideration. Develops a written update on recruitment process for Select Board review (at <u>9/11 meeting</u>)
<u>September 25</u>	Screening Committee selects finalist candidates for the Select Board interview process. Delivers list of finalists to Select Board.
<u>October 2 (wk of)</u>	Select Board conducts interview process.
<u>October 10</u>	Board selects candidate and enters into negotiation with chosen candidate to reach agreement.
November 13	New Town Manager commences employment.

*Underlined dates represent meetings of the Select Board.

If the Board considers a recruiter – anticipate the cost to be anywhere from \$12,000 to \$15,000 (based on the cost of Arlington's search). I expect the recruiter would manage all the steps in the timeline and create all materials. Hiring a recruiter would not omit a screening committee. Given the potential for a brief period of vacancy in the position, the Board should consider whether to appoint a temporary or acting Town Manager to perform the duties pending the start of the new Town Manager.



Jeffrey M. Hull
Town Manager

cc: Susan Inman, Assistant Town Manager/Human Resources Director



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June 21, 2023

Lauren F. Goldberg, President
KP | Law, PC
Floor 12
101 Arch Street
Boston, MA 02110-1134

Dear Ms. Goldberg:

Enclosed is the "Agreement for Town Counsel Services" for the period July 1, 2023 through and including June 30, 2024. At the Board's June 12, 2023 meeting they voted to enter into this one-year agreement and also to incorporate the legal services associated with representing the Town on the Olin Chemical Superfund site, potential redevelopment of the Olin Chemical Superfund site by New England Transrail and Wilmington Woburn Industrial and the required filings with the federal Surface Transportation Board and finally any legal matters that may arise related to the Maple Meadow Landfill.

A transition of information related to these matters will be occurring with Attorney Daniel Deutsch with the firm Brooks & DeRensis. Effective on July 1, 2023 the Town will be expecting legal representation on these environmental matters from KP Law.

Kindly execute both copies of the agreement and return one fully executed copy to my attention. Thank you for your attention to these matters.

Sincerely,

Jeffrey M. Hull
Town Manager

Enclosure

cc: Select Board *(WITHOUT ENCLOSURE)*



Town of Wilmington
Office of the Town Manager
121 Glen Road
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June 22, 2023

Paul R. DeRensis, Esquire
Brooks & DeRensis, PC
Suite 700
260 Franklin Street
Boston, MA 02110-3112

Dear Mr. DeRensis:

This correspondence serves to confirm that the Select Board, at their June 12, 2023 meeting, voted to assign representation for matters related to the Olin Chemical Superfund Site, New England Transrail/ Wilmington Woburn Intermodal and the federal Surface Transportation Board and the Maple Meadow Landfill to existing Town Counsel KP Law. As a consequence, the Town will not be entering a new contract with Brooks & DeRensis once the existing contract expires on June 30, 2023.

On behalf of myself and the Board we extend our gratitude for the legal representation and attention to detail that Attorney Deutsch has provided to the Town over the past 17 years. The legal counsel required to respond to the complexities associated with the Superfund site and the attention required to respond to efforts to redevelop the Superfund site are commended.

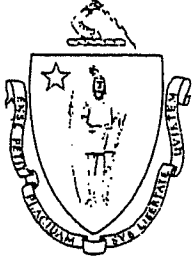
The desire to reassign the legal representation on these matters is not a reflection of dissatisfaction with representation but a desire to fulfill a longstanding intention to bring these matters into the fold of issues to be addressed by Town Counsel.

Your assistance with the transition is greatly appreciated. Best wishes for continued success.

Sincerely,

Jeffrey M. Hull
Town Manager

cc: Select Board
Daniel R. Deutsch, Esq., Brooks & DeRensis



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CENTRAL MASSACHUSETTS DIVISION
10 MECHANIC STREET, SUITE 301
WORCESTER, MA 01608

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

(508) 792-7600
(508) 795-1991 fax
www.mass.gov/ago

June 22, 2023

Elizabeth M. Lawrenson, Town Clerk
Town of Wilmington
121 Glen Road
Wilmington, MA 01887

Re: **Wilmington Annual Town Meeting of April 29, 2023 – Case # 10898**
Warrant Article # 47 (Zoning)

Dear Ms. Lawrenson:

Article 47 - We approve Article 47 from the April 29, 2023 Wilmington Annual Town Meeting.

Note: Pursuant to G.L. c. 40, § 32, neither general nor zoning by-laws take effect unless the Town has first satisfied the posting/publishing requirements of that statute. Once this statutory duty is fulfilled, (1) **general** by-laws and amendments take effect on the date these posting and publishing requirements are satisfied unless a later effective date is prescribed in the by-law, and (2) **zoning** by-laws and amendments are deemed to have taken effect from the date they were approved by the Town Meeting, unless a later effective date is prescribed in the by-law.

Very truly yours,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

Nicole B. Caprioli

By: Nicole B. Caprioli
Assistant Attorney General
Municipal Law Unit
10 Mechanic Street, Suite 301
Worcester, MA 01608
(508) 792-7600 ext. 4418

A TRUE COPY ATTEST

Elizabeth Lawrenson
TOWN CLERK

cc: Town Counsel Mark R. Reich

Massachusetts Department of Revenue Division of Local Services

Geoffrey E. Snyder, Commissioner

Sean R. Cronin, Senior Deputy Commissioner of Local Services

Shawsheen Valley

6/16/2023

Re: EXCESS AND DEFICIENCY - Shawsheen Valley

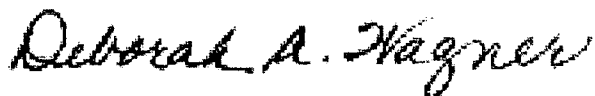
Based upon the unaudited balance sheet submitted, I hereby certify that the amount of excess and deficiency or "E & D" as of July 1, 2022 for Shawsheen Valley is:

General Fund \$2,076,116.00

This certification is in accordance with the provisions of G. L. Chapter 71, §16B½, as amended. The unencumbered funds certified above in excess of five percent of the operating budget and budgeted capital costs for the succeeding fiscal year must be applied to reduce the current fiscal year's assessment in accordance with the joint guidance issued by the Division of Local Services and the Department of Elementary and Secondary Education dated May 2023. For your district, this excess amount equals \$342,227.00.

This certification letter will also be e-mailed to the school superintendent, the board of selectmen in each member town and the city council in each member city immediately upon approval, provided an e-mail address is reported in DLS' Local Officials Directory. Please forward to other officials that you deem appropriate.

Sincerely



Deborah A. Wagner
Director of Accounts
Massachusetts Department of Revenue



Town of Wilmington
Office of the Town Accountant
121 Glen Road
Wilmington, MA 01887-3597

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June 22, 2023

TO: Select Board

RE: Impacts to Middlesex County Retirement Obligation – Additional Payments

I wanted to take the chance to provide an update with the analysis on the additional payments the town has made in an effort to defray future pension liabilities. As you may recall, we reached out to Segal, the actuarial firm that works with the Middlesex County Retirement System. Their analysis (below in *italics*) factors in the first six (6) pre-payments made:

<u>Fiscal Year</u>	<u>Additional Payment Amount</u>
2017	\$500,000
2018	1,000,000
2019	500,000
2020	1,000,000
2021	1,500,000
2022	1,500,000
Total	6,000,000

The six payments above, accumulated with interest at the actuarial rate of return, increased the Town's actuarial value of assets and decreased the Town's January 1, 2022 unfunded liability by approximately \$7.42 million as of January 1, 2022. In order to demonstrate the impact of the lower unfunded liability, we have attached an exhibit with the Town's projected payments on the unfunded liability through fiscal year 2036, with and without the value of these six payments.

The extra payments lowered the Town's fiscal 2024 amortization payment and appropriation by approximately \$651,000. The savings increase each year and are projected to total approximately \$12,978,000.

Please note that the projected amortization payments assume no future investment gains or losses or change in the investment return assumption.

I have also included the table showing the benefit of these pre-payments. The FY24 assessment that will be paid in the very near future would have been approximately \$650k more without these payments. Over the life of our pension assessments, the \$6,000,000 in pre-payments are projected to save the town nearly \$13,000,000 by 2036. It is important to note that this analysis does not yet factor in the FY23 pre-payment of \$1,500,000 nor the pending FY24 pre-payment of \$1,000,000.

Middlesex Country Retirement System
Town of Wilmington - impact of extra payments
Based on results of January 1, 2022 valuation

Amortization Payment on
Unfunded Actuarial Accrued Liability

Fiscal year ended June 30:	With Extra Contributions	Without Extra Contributions	Difference
2024	7,583,000	8,234,000	651,000
2025	8,125,000	8,823,000	698,000
2026	8,704,000	9,452,000	748,000
2027	9,323,000	10,124,000	801,000
2028	9,984,000	10,842,000	858,000
2029	10,495,000	11,496,000	1,001,000
2030	10,915,000	11,956,000	1,041,000
2031	11,352,000	12,434,000	1,082,000
2032	11,806,000	12,932,000	1,126,000
2033	12,278,000	13,449,000	1,171,000
2034	12,769,000	13,987,000	1,218,000
2035	13,280,000	14,546,000	1,266,000
2036	13,811,000	15,128,000	1,317,000
2037	-	-	-
Total Savings			12,978,000

Should you wish to discuss this further, I will be available to answer any of your questions.

Thank you,



Bryan Perry
 Finance Director/Town Accountant

cc: Jeffrey M. Hull, Town Manager
 Finance Committee



June 16, 2023

Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division, Environmental Enforcement Section
P.O. Box 7611
Washington, D.C. 20044-7611

Re: Comments on Consent Decree
United States of America and Commonwealth of Massachusetts v. American
Biltrite Inc., et al., Civil Action No. # 1:23-cv-11044, D.J. Ref. No. 90-11-3-08919/1
Olin Chemical Superfund Site
Wilmington, Massachusetts

To Whom it May Concern:

Verdantas LLC (Verdantas) prepared this letter at the request of the Town of Wilmington (the Town) to provide comments on the Consent Decree associated with United States of America and Commonwealth of Massachusetts v. American Biltrite Inc., et al., Civil Action No. # 1:23-cv-11044, D.J. Ref. No. 90-11-3-08919/1 that was filed in United States District Court, District of Massachusetts on May 11, 2023. The Consent Decree is associated with for the Olin Chemical Superfund Site (OCSS) located in Wilmington, Massachusetts.

BACKGROUND

The OCSS is organized into three Operable Units (OUs). OU1 includes on-property soil, sediments, and surface water; vadose-zone soil (soil above the water table), and vapor intrusion. OU2 includes off-Property soil, sediments, and surface water. OU3 includes all on- and off-Property groundwater areas that have been affected by contamination from the OCSS, including areas of dense aqueous phase liquid (DAPL).

The United States Environmental Protection Agency (EPA) selected a remedial action to be implemented at the OCSS, as identified in the Record of Decision (ROD) executed on March 30, 2021. The ROD presented the selected final remedial action for OU1 and OU2, and an interim remedial action for OU3. The ROD indicated that the final remedy for groundwater (OU3) will be established in the future. Although the ROD noted that the interim OU3 remedy will prevent unacceptable risks from exposure to contaminated groundwater, the ROD did not establish final cleanup levels and performance standards for groundwater. The ROD states:

“Cleanup levels were not established for DAPL and groundwater hotspots [sp.] spots because the interim remedial actions developed for the Site are focused on removing contaminant mass from the groundwater and minimizing further impacts to the aquifer rather than risk-based endpoints.”

The ROD indicates that additional information will be gathered to support selection of a final remedy for OU3. The ROD also states that a separate ROD for the final remedy for groundwater (OU3) would be issued in the future:

"Remediation goals and cleanup levels for groundwater will be established by EPA in the final ROD for groundwater (OU3)."

COMMENTS ON CONSENT DECREE

Our comments on the Consent Decree are provided below in no particular order.

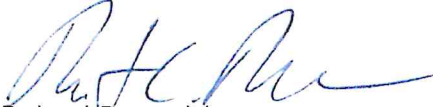
1. Section 6.8 of Appendix B (Statement of Work) identifies that the Remedial Action is "Complete" when Performance Standards (i.e., the cleanup levels and other measures of achievement of the remedial action objectives, as set forth in the ROD) have been achieved. However, the ROD did not establish remediation goals, cleanup levels, or other measures for achievement of the remedial action objectives for the OU3 interim remedy. The cleanup levels and performance standards identified in Tables L-1 and L-2 in Appendix B of the ROD only identify those cleanup levels and performance standards for OU1 and OU2. It is unclear what Performance Standards will be used to identify when the OU3 interim remedy is "Complete." The Consent Decree should provide additional information on the Performance Standards that will be used to identify when the Remedial Action for OU3 is "Complete."
2. Once the Remedial Action is "Complete," the Settling Defendants could then undertake actions to obtain a Certification of Remedial Action Completion from EPA. However, for the OU3 interim remedy, the remediation goals and cleanup levels have not yet been established, and therefore the final remedy for OU3 would not be complete. Therefore, instead of issuing a Certification of Remedial Action Completion for the OU3 interim remedy, EPA should issue a Certification of Interim Remedial Action Completion after the Performance Standards for the OU3 interim remedy are achieved. A Certification of Remedial Action Completion for OU3 should be issued only after the cleanup levels and performance standards identified in the future ROD for OU3 are achieved.
3. Appendix B (Statement of Work) of the Consent Decree provides schedules for deliverables and tasks associated with the final remedy for OU1 and OU2 and the interim remedy for OU3. However, the Consent Decree does not provide a timeline for issuance of the final ROD for OU3, nor timelines for the work needed to collect the information necessary to support the selection of the final remedy for OU3. The Consent Decree should identify those tasks needed to select the final remedy for OU3, provide schedules to complete these tasks, and provide a timeframe for issuing the final ROD for OU3.
4. Section 6.3 of Appendix B (Statement of Work) indicates that the Settling Defendants shall hold a preconstruction conference with EPA. Based on the schedules provided in Section 9.2, implementation of the remedies for the different

Remedial Actions will occur at different timeframes (e.g., the schedule for surface water remediation will occur after the activation of the DAPL and Groundwater Hot Spots Extraction and Treatment remedial action). The Consent Decree should consider holding separate preconstruction conferences prior to the initiation of each Remedial Action.

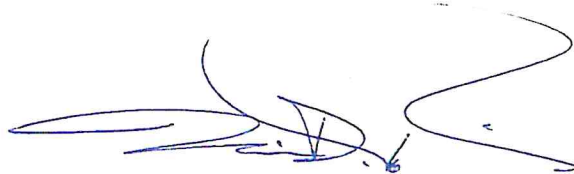
5. Section 6.4 of Appendix B (Statement of Work) indicates that the Settling Defendants shall obtain necessary federal or state permits or approval for off-site work. This section should be expanded so that the Settling Defendants also obtain necessary local permits or approval for off-site work.

If you have questions regarding these comments, please do not hesitate to contact us at (978) 679-1600.

Sincerely,
VERDANTAS LLC



Robert Reynolds
Project Engineer



Kevin Trainer, C.P.G., P.G., L.S.P.
Senior Geologist

cc: Jeffrey Hull, Town Manager

June 16, 2023

Assistant Attorney General
Environment and Natural Resources
Division of Environmental Enforcement Section

Via email: pubcomment-ees.enrd@usdoj.gov

Cc: Melanie Morash/EPA, Christopher Kelly/EPA & Garry Waldeck/DEP

Re: United States of America and Commonwealth of Massachusetts v. American Biltrite Inc., et al., Civil Action No. # 1:23-cv-11044, D.J. Ref. No. 90-11-3-08919/1

The Wilmington Environmental Restoration Committee (WERC) is the TAG Group of record for the Olin Superfund site in Wilmington, MA, and has been since 2008. As such we share diverse talents, perspectives and observations that reflect various levels of understanding of the Olin site and the Superfund process in our affected communities.

A number of our members have been active and involved in advocating for the clean-up of the Olin site since the mid-1990's, when the site was under the jurisdiction of the Massachusetts Department of Environmental Protection (MassDEP). Several of our members were first to identify n-nitrosodimethylamine (NDMA) as a potential contaminant of concern, and worked tirelessly to have it added to MassDEP's sampling requirements in 2002. Other members were instrumental in working with the Massachusetts Department of Public Health and local families whose children were diagnosed with cancer in the late 1990s. We have a firm understanding of the site's long history.

It's been more than 50 years since Olin became the sole supplier of hydrazine to Stepan Company in 1970; more than 40 years since Olin acquired the property on Eames Street; 30 years since Conestoga-Rovers conducted the first Comprehensive Site Assessment and NDMA was identified in monitoring well BR-1; 20 years since the Town of Wilmington turned off its 5 municipal drinking water wells in the Maple Meadow Brook Aquifer due to NDMA contamination from the Olin property; 17 years since the site was finalized on the National Priorities List; and now 2 years since the DPH Childhood Cancer Study indicating a likely relationship between childhood cancers and the presence of NDMA in the town's water supply was published, and the Partial Record of Decision was issued in March, 2021.

Time seemingly flies for Olin and its regulators, while local residents and wildlife live with the site and its adverse impacts every day. Being told that other sites in Region 1 have been on the

NPL nearly twice as long and are still not “clean” does not provide us comfort nor confidence in the Superfund process.

After decades of site investigations, legal proceedings, and, frankly, stalling on all fronts by the Settling Defendants, WERC is relieved that some aspects of “clean-up” will finally move forward. Given that it has already been 30 years since the site has been a known source of uncontrolled and on-going releases, we assert that the proposed schedule in the Statement of Work is far too slow. Waiting another 15 years is unacceptable. We also are still frustrated that groundwater contamination has not been the number one focus of efforts to date, but accept EPA’s interim action to start pumping in several areas of greatest known concentration of contaminants as progress.

WERC has completed a review of the draft Consent Decree (CD) for final action on OU1 and OU2 and interim action on OU3. We have several comments, outlined in the attached memorandum.

Also, an observation – the Consent Decree document(s) as downloaded from the DoJ’s website are practically impossible to navigate and review. The EPA’s website provides each document/appendix as a free-standing pdf, which is much more logical to download and review for average members of the public.

Respectfully yours,

The Wilmington Environmental Restoration Committee (WERC)
Martha Stevenson, President

Enclosures: Wilmington Environmental Restoration Committee (WERC) Memorandum dated June 16, 2023

MEMORANDUM

Date: June 16, 2023

From: Wilmington Environmental Restoration Committee (WERC)

To: Department of Justice, Environment and Natural Resources, Division of Environmental Enforcement Section

cc: Melanie Morash/EPA, Christopher Kelly/EPA & Garry Waldeck/DEP

Re: WERC Comments on:
Draft Consent Decree – Final Action OU1 & OU2 and Interim Action OU3
Olin Chemical Superfund Site - Wilmington, MA

WERC has completed a review of the draft Consent Decree (CD) for final action on OU1 and OU2 and interim action on OU3. While WERC is pleased that the cleanup will finally move forward on the site, WERC has concerns with several items in the draft CD. The largest issue is the schedule, which is unnecessarily long for the work to be performed. For 30 years members of WERC have been working to have the site cleaned -up; adding another 15 years for this phase of work is too long. WERC identifies here, opportunities to modify and shorten the schedule.

The following are WERC comments:

Consent Decree (Text)

1. Page 3, Paragraph 6. Reads:

WHEREAS, the defendants that have entered into this Decree (“Settling Defendants”) do not admit any liability to Plaintiffs arising out of the transactions or occurrences alleged in the complaint, nor do they acknowledge that the release or threatened release of hazardous substances at or from the Site constitutes an imminent and substantial endangerment to the public health or welfare or the environment.

Settling Defendants (Olin and the other PRPs), will go forward with the clean-up, but are not admitting to guilt or responsibility for the contamination. From the community position, admission of guilt and responsibility is an important aspect of the clean-up and the Superfund process. For EPA to agree in this legal document that there has been no “imminent and substantial endangerment to the public health or welfare or the environment” when, in fact, such impacts have already been demonstrated, is an affront to the community.

The CD should acknowledge that the Town of Wilmington has sustained a significant financial loss due to the contamination of the Maple Meadow Brook Aquifer.

The CD should also recognize and incorporate the findings of the Massachusetts Department of Public Health's 20-years long Childhood Cancer Study, which found that there was a statistically significant association between the childhood cancers in Wilmington and prenatal exposure to NDMA present in the town's water supply.

Appendix A – Record of Decision

1. If including the citation we propose above is not permissible in the CD language itself, then the 2021 Partial ROD should be revised to include at least a mention of the MADPH study's findings. (We recognize that both documents were made public within a matter of days/weeks so that EPA would not have had time to amend its text at that point.)

The site description/history mentions that the Town's wells were shut down, but does not state that the contamination *per se* has created a financial hardship for the community.

2. Page 148-149. Olin Comment 4 and EPA's Response

EPA disagrees with Olin's assertion that there is "no likelihood of leaching" from the Containment Area (CA), countering that there is "insufficient data" to support it. WERC agrees with EPA's rebuttal, but we still believe additional investigation/characterization of the CA is needed, particularly in the deeper portions and in areas not previously remediated (such as the Buried Drum Area). The slurry wall is nearing the end of its projected lifespan, and there is no certainty that the wall is keyed into the bedrock around its entire perimeter, or that the integrity of underlying bedrock is adequate to prevent leakage.

Appendix B – Scope of Work

1. Page 6, Community Involvement. WERC fully supports having Olin and the other PRPs be active in the Community Involvement effort. To date, Olin and the other PRPs have avoided being present in the community forums. No matter how difficult the issues and situation, avoiding the community has only made the issues worse.

2. Page 7, Paragraph (c) Community Involvement WERC also fully supports Olin and the other PRPs establishing an online community information repository for all documents. To date, all information has passed through EPA and their consultant, which should not be their responsibility. All relevant reports and correspondence should be posted in a timely manner to allow adequate time for review and comment when warranted.

3. Page 18, Paragraph 6.2 – Independent Quality Assurance Team (IQAT). WERC would want the IQAT to be independent third party. To date, the clean-up effort has been very contentious between Olin and the agencies. A third party can reduce the conflict and speed up the process.

4. Page 19, Paragraph 6.4 Permits. WERC understands that permits are not required for this work, because of CERCLA. However, WERC hopes that because of the extensive amount of work in wetlands on the site and in Maple Meadow Brook, that the local Conservation Commission would be informed and their inputs considered prior to the work in the wetlands

and streams. WERC also maintains that perpetual conditions stipulated by permitting authorities prior to the site's listing on the NPL should remain in force.

5. Page 21, Paragraph (c) Shakedown Period. For the DAPL and GW Hotspots, Surface water and LNAPL projects, Olin and the other PRPs have a 1 year shakedown period. Shakedown period is the time period between completion of construction and when the operation remedy is functioning as designed. Two issues: a 1 year shakedown period is unnecessarily long for the facilities being constructed. A shakedown period of 3 or 6 months is sufficient. Secondly the time period (up to 1 year or 365 days) should be included in Schedule Tables later in the Appendix B. Though Shakedown is listed in the tables, their duration is not included.

6. Page 27, Paragraph 8.7 Supporting Deliverables – The supporting deliverables include Health and Safety Plan, Emergency Response Plan, Field Sampling Plan, Quality Assurance Plan, Site Wide Monitoring Plan, Community Impacts Mitigation Plan, Construction Quality Assurance Plan, Construction Quality Control Plan, Transportation and Off-Site Disposal Plan, Operation and Maintenance Plan, Operation and Maintenance Reporting and Operating Maintenance Manual. It is not clear and rather difficult to determine, what the schedule is for the submission of these documents. Though some of these documents are referred to in Section 5. Remedial Design and Section 6 Remedial Action, not all documents are. Also, none of the documents are listed in the Section 9. Schedules. This needs to be clarified, and the documents should be included in Section 9. Schedule tables.

7. Page 31, Section 9. Schedules. It is difficult using the schedule tables in Section 9 to determine the overall schedule for the project. Using the information in the tables, such as duration and sequencing, WERC developed a schedule (very basic Gantt Chart) to evaluate the schedule. This would let WERC determine roughly what year we could expect the start of the DAPL and GW Hotspots system to start, for example, and give us a rough idea of the overall schedule. To develop a schedule, WERC had to make two assumptions:

a. EPA Review Time – 60 days for draft documents and 30 days for final documents. Reasonable estimate on average. Some reviews can be shorter duration, but some will be longer.

b. Construction Duration – 1 Year for DAPL and GW Hotspots and 6 months for all other projects.

To develop the duration for each task, WERC added the duration of each subtask for Olin and the other PRPs from the Section 9 schedule tables and then added assumed EPA review times and construction duration for each subtask. Figure 1 and Table 1 provide the schedule based on this information. The schedule assumes minimal shakedown periods.

Major milestones of the resulting schedule are as follows:

1. Start of construction of DAPL & GW Hotspots remedy is Year 5. Operation starts in either Year 6 or Year 7 depending on the duration of the shakedown period.

2. The start of the design of the Surface Water remedy is after startup of DAPL & GW Hotspots system which will be Year 6 or 7. Start of operation of the Surface Water remedy is Year 10 or 11, again depending on the shakedown period.

3. The start of the design of the Wetland Soil and Sediments remedy is after startup of the Surface Water remedy, which will be Year 10 or 11. The remediation of the Wetland Soils and Sediments is not completed until Year 14 or 15.

Waiting, and allowing another 10 years of uncontrolled release of contamination to the stream is contrary to CERCLA and should not be allowed. Waiting for the startup of the NDMA & GW Hotspots remedy before starting the design of the Surface Water Remedy and similarly, waiting for the startup of the Surface Water remedy before starting the design of the Wetland Soils and Sediments is unnecessary. WERC recognizes that for many site cleanups, groundwater is remediated before remediating soils and sediments, but that is not needed here. There is no reason for the delay of Surface Water remedy or the Wetland Soils and Sediments remedy.

This phase of the groundwater cleanup (DAPL & GW Hotspots) is only for the deeper and most contaminated groundwater. It is intended to prevent the deeper DAPL and NDMA from migrating further. This DAPL & GW Hotspots remedy will not clean up near-surface groundwater and nor will it have any impact to the Surface Water remedy or the Wetland Soil or Sediments Remedy.

The Surface Water remedy treats ammonia and chromium which has been discharged to the stream through groundwater. This contamination has severely impacted the aquatic life in the stream on the site and downstream of the site since the 1980's (and earlier). There is no reason why the DAPL and GW Hotspots remedy has to start prior to starting the Surface Water remedy. At a minimum, the Surface Water remedy can start concurrently with the DAPL and GW Hotspots remedy. Waiting, and allowing another 10 years of uncontrolled release of contamination to the stream is contrary to CERCLA and should not be allowed. WERC suspects over the next 10 years, that Olin and the other PRPs are hoping that enough ammonia and chromium on the site will be discharged to the stream so that the stream concentration of the two contaminants will be below action levels. Olin and the other PRPs should not be rewarded for further dragging out the project.

Similarly, the Wetland Soil and (Stream) Sediments remedy does not need to be delayed. The Wetland Soils and Sediments are contaminated with chromium and BEHP. During discussion of the development of the Feasibility Study and the Record of Decision, the question of recontamination of the Wetland Soils was discussed. It was determined that groundwater concentrations were not sufficient for recontamination. The wetland soils contamination was from historic conditions. If recontamination was an issue, the groundwater would need to be treated for BEHP, which it isn't.

The schedule allows for redevelopment of the site before the remedies for Surface Water and Wetland Soils and Sediments are performed. This is very discouraging for WERC. The Surface Water remedy and the Wetland Soils and Sediments are modest size projects. Both can be

completed much sooner and the OU-1 and OU-2 operable units of this site be completely cleaned up with only OU3 remaining.

The schedule for the LNAPL remedy has an option to be designed and constructed at the same time as the DAPL and GW Hotspots, or delay and start the design after the completion of the DAPL & GW Hotspot remedy. There is no reason to provide a delayed option for the LNAPL.

8. Missing – End of Operation. Lastly, the draft Consent Decree should include the criteria to be met to stop operations of the three treatment remedies, DAPL & GW Hotspots, LNAPL, and Surface Water. For example, is the criteria for the DAPL defined by specific gravity, pH, specific conductance or the individual constituent (ammonia, chloride, magnesium, sodium, sulfate) concentrations? Similarly, for Surface water, are the criteria surface water standards for ammonia and chromium concentrations? Also, the current expected duration of the operation of each treatment remedy should be presented. Is it 2-3 years or 10 to 20 years?

Appendix C Map

1. No Comments

Appendix A RI/FS AOC

1. No Comments

Appendix E Lien Release Agreement

1. No Comments

Appendix F Letter for PPA

1. No Comments

Summary comments

For the past almost 30 years that we have been involved with this site the contamination from this site has been unconfined, uncontrolled and has migrated far distances. It has not only contaminated a public water supply and resulted in cancer and deaths of our children, but it has also re-contaminated the surface waters to the neighboring Industri-Plex Superfund Site, has contaminated private wells, and has permeated underlying bedrock. The continued delay in remediation has resulted in serious impacts to our community and the surrounding environment.

The further delay proposed in cleaning up the surface waters and wetlands will only continue to adversely affect the environment in particular, and potentially human health in ways as yet unknown or unidentified, and for potentially another 2 decades. Meanwhile Olin and its predecessors benefit from the reuse of the property.

These delays become even more beneficial to Olin and the other Settlement Defendants as they seek concurrently during the ROD timeframe to develop a case for a Technical Impracticability Waiver to avoid having to clean up the groundwater contamination (OU3) that is the fundamental driver of the Olin Chemical Site's inclusion on the National Priorities List.

WERC finds this situation untenable and failure to restore the Maple Meadow Brook Aquifer to its fullest, unacceptable.

Table 1

**Rough/Draft Schedule – Olin Site
Remedial Design and Construction**

Major Task Grouping	Tasks	Subtasks	Olin Task Duration (days)	Draft – 60 days Final – 30 days Estimate EPA Review (days)	Total (days)	Dependency
Remedial Design						
	Remedial Design Work Plan	5.1 & 5.2	150	90	240	CD Approval
	DAPL & Hotspots – Preliminary Design Investigations WP & Design	5.4(a&b), 5.6, 5.7, 5.8, 5.9	585	300	885	RDWP Approval
	Upland Soil – Preliminary Design Investigations WP & Design	5.4(a&b), 5.6, 5.7, 5.8, 5.9	495	300	795	RDWP Approval
	LNAPL – Preliminary Design Investigations WP & Design	5.4(a&b), 5.6, 5.7, 5.8, 5.9	495	300	795	RDWP Approval or Construction of DAPL/Hotspot System
	Surface Water – Preliminary Design Investigations WP & Design	5.4(a&b), 5.6, 5.7, 5.8, 5.9	495	300	795	Construction/Shakedown of DAPL/Hotspot System
	Wetland Soil & Sediments – Preliminary Design Investigations & Design	5.4(a&b), 5.6, 5.7, 5.8, 5.9	435	300	735	Construction/Shakedown of Surface Water System
Remedial Action (Construction)						
	DAPL & Hotspots – Remedial Action WP & Design (to start of Construction)	6.1, 6.2, 6.3(a)	195	90	285	Approval of Remedial Design for DAPL/Hotspots
	Upland Soil – Remedial Action WP & Design (to start of Construction)	6.1, 6.2, 6.3(a)	150	90	240	Approval of Remedial Design for Upland Soils
	LNAPL – Remedial Action WP & Design (to start of Construction)	6.1, 6.2, 6.3(a)	150	90	240	Approval of Remedial Design for LNAPL
	SW – Remedial Action WP & Design (to start of Construction)	6.1, 6.2, 6.3(a)	150	90	240	Approval of Remedial Design for SW
	Wetland Soil & Sediments – Remedial Action WP & Design (to start of Construction)	6.1, 6.2, 6.3(a)	150	90	240	Approval of Remedial Design for Wetland Soils & Sediments

Assumptions: EPA Review is 60 days for draft and 30 days for final documents

Construction: 1 year for DAPL & Hotspots and 6 months for all others.

May be additional 1 year for shakedown period (allowed by EPA)



TOWN OF WILMINGTON
DEPARTMENT OF PUBLIC WORKS

Highway
Tree

Water & Sewer
Parks & Grounds

Engineering
Cemetery

Interoffice Memorandum

TO: Wilmington Select Board

FROM: Jamie Magaldi, PE, MCA, Public Works Director *JM*

SUBJECT: Impending Water Regulations – Appeal Opportunity for Wilmington

DATE: June 22, 2023

Massachusetts Department of Environmental Protection (MADEP) regulates the amount of water that can be withdrawn by public water systems through its Water Registration Program. Calendar year 2023 is the renewal year for these Registrations.

The MADEP is amending the existing regulations to include a new condition that would require registrants to restrict their own nonessential outdoor water use during times of drought declared by the Secretary of Energy and Environmental Affairs (EOEA). Essentially, when a drought is declared per the indices in the MA Drought Management Plan, communities like Wilmington and the other approximately 62 public water systems with Registrations will be required to implement and enforce water restrictions or total water bans, potentially. While Wilmington currently imposes its own water restrictions, the new regulations would become a requirement and eliminate any administrative flexibility from the town.

While it may seem straightforward, there are several elements in the proposed conditions that will be challenging to implement and enforce without involving other Town departments, most notably the Wilmington Police. There are also administrative requirements that must be completed with timely deadlines.

Other public water systems have questioned the lawfulness of the regulation amendments and several water systems in Massachusetts informed Massachusetts Water Works Association (MWWA) of the interest in joining forces to challenge their legality through the official appeal process. Some concerns that were expressed by the group are as follows:

1. The new regulations will force cities and towns to restrict water usage during drought periods as determined by the Secretary of Energy and Environmental Affairs (SEEA). This concerns the MWWA and public water suppliers as drought periods could be declared for prolonged periods, or effectively year-round, as deemed by the SEEA. The group feels this restriction will inevitably lead to less volumes of water being used and therefore decreased water quality due to stagnant water in the system. This indirectly will require systems to increase flushing to improve water quality, thus negating the intended conservation efforts.

2. The regulations are written in a way that could mandate water restrictions for prolonged periods, and even year round. This may have unintended consequences as constant conservation messaging could lose impact over time and become ignored. Although there are some exemptions such as irrigation of municipal playing fields, DEP's one-size-fits-all approach to mandating water restrictions during droughts may strictly affect homeowner's ability to irrigate, wash cars, or perform other watering activities. It's important to note that stricter or amended regulations could be enacted, regardless of the town's dependence on the currently abundant MWRA supplemental supply.
3. Mandated water use restrictions will likely lead to decreased revenue to local Water Departments. The concern is that less revenues will then ultimately impact the ability to supply adequate water to the public and will impact system maintenance, thus potentially forcing higher rates. Since the regulations give the restriction power to the SEEA and MADEP, the group feels local suppliers lose control over their individual systems and this may open the door for future, more stringent regulatory controls.
4. In addition to the above concerns, the regulations also force an enforcement burden on cities and towns who will be required to issue fines for violations to the water restrictions. The group stated that the regulations "deprive water systems of using registration-approved volumes as intended".

As a Public Water System, Wilmington is supportive of water conservation, particularly during drought conditions exacerbated by climate change. Our core purpose requires us to ensure that we have sufficient water supply for our customers/residents at all times – it is a responsibility we have been managing since the creation of our supply. No two water systems are alike – and two systems in the same drought declaration region may experience completely different conditions. For instance, comparing Wilmington's unique system which currently relies on local groundwater wells but is supplemented by a *plentiful, clean and reliable* supply through the MWRA should not be compared equally to other suppliers which rely solely on local wells.

It is interesting to note that on May 1, 2023 the Town of Wilmington was informed by the Ipswich River Watershed Association (IRWA) that they have also filed an appeal of the proposed water regulations through the DEP's Office of Appeals and Dispute Resolutions (OADR), but it is unclear at this time what the basis of their appeal is, other than to protect their rights to be included in the regulatory process.

The Office of Burns and Levinson reached out to MWWA and several Public Water Systems (PWS) to gauge interest in joining an appeal group in January of 2023. Although it was likely an appeal would be filed anyway on behalf of other PWSs, this was Wilmington's opportunity to be involved in challenging regulations which will ultimately impact Wilmington residents and revenue which is important for the sustainability of Wilmington's water system. As Wilmington felt it was important to reserve our right to comment on behalf of our best interests, the Town of Wilmington joined the appeal and was listed as a co-plaintiff on an appeal to Superior Court filed February 17, 2023 along with 17 other Public Water Systems. The appeal is currently ongoing and will likely continue into the Fall of 2023.



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Gina Fiandaca, Secretary & CEO



Sumner Tunnel Restoration Project

#DitchTheDrive: Social Media Toolkit

The Massachusetts Department of Transportation (MassDOT) has a comprehensive mitigation plan to address travel impacts and provide cost effective alternative transportation options for residents and visitors ahead of the scheduled closure of the Sumner Tunnel from Wednesday, July 5, through Thursday, August 31, 2023. The tunnel will be fully closed for approximately two months to facilitate work on the Sumner Tunnel Restoration Project.

Travelers are encouraged to Ditch the Drive and use alternative means of travel. MassDOT has created a menu of safe, efficient commute options while the tunnel is closed for repairs. Travelers can utilize [MassDOT 511](#) to help review traffic conditions and [MBTA's Trip Planner](#) to plan their public transit trips.

Use this toolkit to post on social media about the upcoming closure and travel options. Questions about this toolkit may be directed at Kristin.Diamond@dot.state.ma.us

Topline Messages:

- The Sumner Tunnel Restoration Project is a \$160 million investment in the Commonwealth's infrastructure. To achieve this work, **the Sumner Tunnel will be closed from Wednesday, July 5, through Thursday, August 31, 2023.**
- The Sumner Tunnel Restoration Project will offer a variety of mitigation options for individuals coming from all travel points. Mitigation options include:
 - Free trips on the MBTA Blue Line
 - MBTA parking lots and garages on the Blue Line will be reduced to \$2/day. Additional free parking will be available near Wood Island Station.
 - Free East Boston MBTA Ferry service
 - Additional ferry service from Lynn, Winthrop, Salem and the Boston Seaport
 - Reduced zone 1A Commuter Rail fares along the Newburyport/Rockport Commuter Rail line and reduced \$2 per day parking costs at the Salem and Swampscott commuter rail lots. Free parking will be available at all MBTA lots north of Salem.
 - Discounted tolls for the Tobin Bridge and Ted Williams Tunnel for those registered in the Resident Discount Program.
 - For travelers to and from Logan Airport, discounted Logan express service and additional MBTA Silver line SL1 service.

How You Can Help:

- Share the word on social media: encourage residents and visitors to #DitchTheDrive if they are able to and utilize public transit options that are provided.
- Share closure messages and public transit alternatives on your social pages and community groups.

Important Links

- [Mass.gov/Sumner-Tunnel](https://www.mass.gov/Sumner-Tunnel)
- [Public Information Events](#)
- [Sign up for MassDOT Updates](#)





Follow MassDOT and the MBTA

- Massachusetts Department of Transportation (MassDOT): @MassDOT on [Twitter](#), [Instagram](#), and [MassDOT](#) on Facebook
- MBTA: @MBTA on [Twitter](#), [thembta](#) on [Instagram](#), [Massachusetts Bay Transportation Authority](#) – MBTA on Facebook
- MBTA Commuter Rail: @MBTA_CR on [Twitter](#), [mbta_cr](#) on [Instagram](#), and [MBTA Commuter Rail](#) on Facebook.

Hashtags to utilize: #SumnerTunnel, #DitchTheDrive, #MassDOT, #Boston, #bospoli

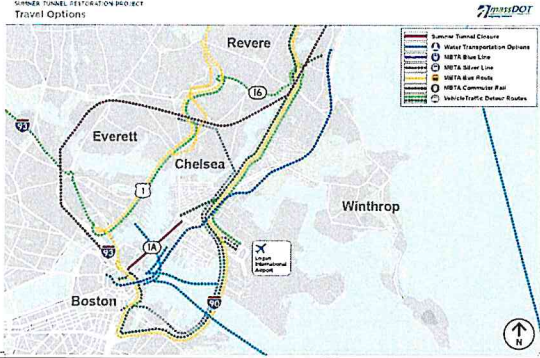
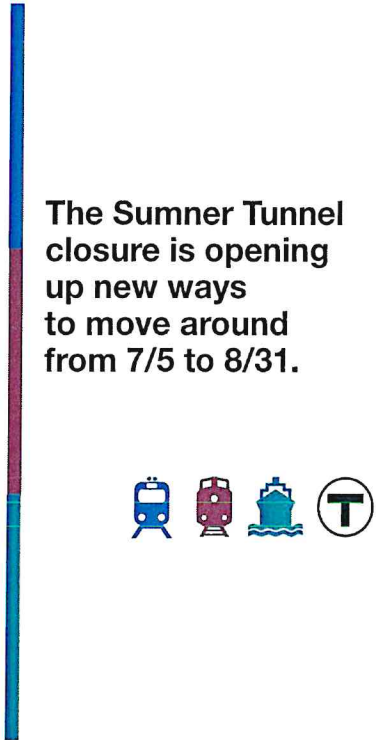

Suggested Social Media Messages

General Closure – Advanced Messaging	The Sumner Tunnel will be closed from July 5, 2023 until August 31, 2023. Plan ahead and find an alternate route at mass.gov/sumner-tunnel
Utilize Public Transit	<p>⚠️ The #SumnerTunnel will be CLOSED from 7/5/23- 8/31/23 ⚠️</p> <p>If you're traveling to or from #Boston this summer, #DitchTheDrive and take advantage of public transportation:</p> <ul style="list-style-type: none"> 🚇 Free trips on the @MBTA Blue Line 🚢 Free and discounted ferry options 🚗 Reduced @MBTA_CR fares & parking costs <p>Check out the many alternative public transportation options at mass.gov/sumner-tunnel</p>
Blue Line Mitigation	The Sumner Tunnel will be closed July 5, 2023 to August 31, 2023. The @MBTA Blue Line will be operating with free fares for all riders. All MBTA parking lots and garages on the Blue Line will be reduced to \$2/day. For more information on the Sumner Tunnel closure visit mass.gov/sumner-tunnel .

	<p>The Sumner Tunnel is closed 7/5/23- 8/31/23. If you are traveling through Boston from the NorthShore, consider public transit options. http://mass.gov/sumner-tunnel</p> <ul style="list-style-type: none">  FREE MBTA blue line service  Reduced @MBTA_CR fares  Reduced @MBTA parking  Ferry service from #Lynn and #EastBoston <p>This summer, while the Sumner Tunnel is closed, utilize free @MBTA blue line service. Find the closest station and route maps at mass.gov/sumner-tunnel.</p> <p>The Sumner Tunnel will be closed July 5, 2023 to August 31, 2023, but the @MBTA blue line will be open. Save time and #DitchTheDrive to Boston this summer. Consider all your public transit options at mass.gov/sumner-tunnel.</p>
Commuter Rail Mitigation	<p>North Shore commuters, this summer during the Sumner Tunnel closure use the @MBTA_CR</p> <p>Zone 1A (\$2.40) fares along the entire Newburyport/Rockport Commuter Rail line directly into North Station. Parking at Salem and Swampscott is reduced to just \$2 per day. Free parking will be available at all MBTA lots north of Salem, including Beverly, Gloucester, Hamilton/Wenham, Newburyport, North Beverly, Monserrat, Rowley, and West Gloucester.</p> <p>For more information on the Sumner Tunnel closure visit mass.gov/sumner-tunnel.</p>
Lynn Ferry Mitigation	<p>This Summer, take the ferry! The Sumner Tunnel will be closed July 5, 2023 to August 31, 2023. Consider #Lynn Ferry service, from Blossom Street in Lynn to Central Wharf in Downtown #Boston. The ferry will operate on Zone 1A fares. For information on ferry service and all other Sumner Tunnel travel alternatives visit mass.gov/sumner-tunnel.</p> <p>The MBTA is now offering ferry service from Lynn. #DitchTheDrive during the Sumner Tunnel closure and take the ferry from Blossom Street in #Lynn to Central Wharf in Downtown #Boston. The ferry will operate on Zone 1A fares. For information on ferry service and all other Sumner Tunnel travel alternatives visit mass.gov/sumner-tunnel.</p>
East Boston Ferry Mitigation	<p>This summer, take the free ferry! The Sumner Tunnel will be closed July 5, 2023 to August 31, 2023. Consider East #Boston Ferry</p>

	service, between Long Wharf and Lewis Wharf. The ferry will be free to all riders. For information on ferry service and all other Sumner Tunnel travel alternatives visit mass.gov/sumner-tunnel .
Logan Airport Travelers	Are you traveling through @BostonLogan this Summer? The Sumner Tunnel will be CLOSED July 5, 2023 to August 31, 2023. utilize public transportation options such as the @MBTA, and @MBTA_CR. http://mass.gov/sumner-tunnel
Sumner Video	The Sumner Tunnel will be closed from July 5, 2023 until August 31, 2023. Plan ahead and find an alternate route at mass.gov/sumner-tunnel

Graphics

Graphics	Alt Text
 <p>The map, titled "SUMNER TUNNEL RESTORATION PROJECT Travel Options", shows the area around Boston, including Everett, Chelsea, Revere, Winthrop, and Boston. It highlights various transportation routes: a red line for the Sumner Tunnel Closure, a blue line for Water Transportation Options, a green line for MBTA Blue Line, a yellow line for MBTA Silver Line, a purple line for MBTA Bus Route, a brown line for MBTA Commuter Rail, and a grey line for Vehicle Traffic Detour Routes. A legend in the top right corner identifies these routes. A north arrow is located in the bottom right corner of the map area.</p>	<p>Sumner Tunnel project regional metro Boston Map. The map depicts all alternative transportation options and detour routes including MBTA service, Commuter Rail, Bus, and Ferry.</p>
 <p>The Sumner Tunnel closure is opening up new ways to move around from 7/5 to 8/31.</p>  <p>A vertical bar on the left side of the text is divided into four colored segments: blue at the top, red, purple, and blue at the bottom. Below the text are three icons: a blue train icon, a purple train icon, and a blue ferry icon, followed by a white 'T' inside a blue circle.</p>	<p>Black text reads: "The Sumner Tunnel closure is opening up new ways to move around from 7/5 to 8/31." Icons for the T, Commuter Rail, and ferry.</p>

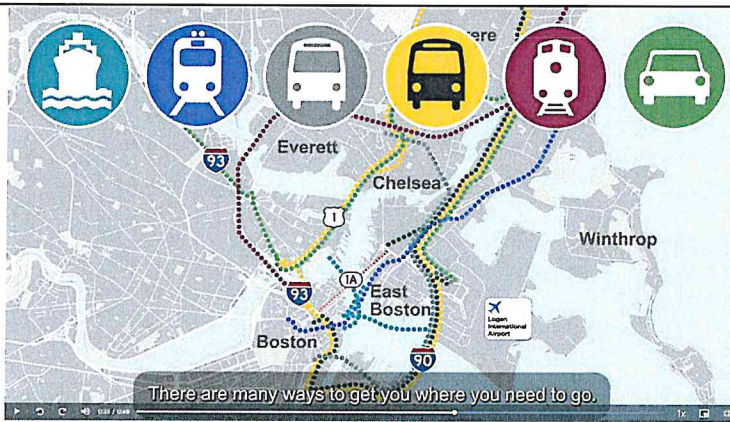
the **Ditch Drive**

Summer Tunnel Closure



July 5 - August 31 2023

Ditch the Drive. Sumner Tunnel Closure July 5 - August 31, 2023. Icons for subway, commuter rail, ferry, bus, and bike and pedestrian options.



There are many ways to get you where you need to go.