CHARLES RIVER
WATERSHED ASSOCIATION

Ending Combined Sewer Overflows:

The Time Is Now!

JUNE 9, 2026

Charles River
Watershed Association

Mystic River
WATERSHED ASSOCIATION

AGENDA

- Background on Combined Sewer Overflows (CSOs)
- What MWRA is proposing
- Myths Vs Facts
- What **YOU** can do

SPEAKERS

Emily Norton

Executive Director, CRWA

Andy Hrycyna

Water Quality Program Manager, MyRWA

Julie Wood

Climate Resilience Director, CRWA

PROMISES MADE, BUT NOT KEPT

Charles River Watershed Association

Mystic River Watershed Association

1949 - Last Charles River beach closed

1972 - Clean Water Act: “fishable, swimmable” rivers by 1983

1995 - EPA Clean Charles Initiative: “swimmable Charles” by 2005

2025 - Gov Healey Biodiversity Plan: “Significantly reduce or eliminate combined-sewer overflows”

August 2025

“LONG TERM CONTROL PLAN”

- Clean Water Act dictates that affected communities establish “Long Term Control Plans” to reduce/eliminate CSOs
- Long Term Control Plans (LTCP) set targets for pollution reduction in terms of *activations* and *volume*.
- Progress is typically monitored by modeling system conditions during a hypothetical “Typical Year”
- The original Boston Harbor litigation is still ongoing, and the goals of the last LTCP are still being contested and challenged in court.
- Draft Updated LTCP released April 30, 2026 by MWRA, Cities of Cambridge & Somerville - dictates next 30+ years of
- Recommends a future “level of control”

AN ENVIRONMENTAL JUSTICE ISSUE

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

Research Shows…

- Communities in Massachusetts that have 2x the concentration of non-white residents tend to have 200% more sewage spilled within their borders.
- Communities that have 2x the rate of poverty tend to have 220% more sewage spilled than their wealthier counterparts.
- Communities with fewer adult English speakers are also systematically overburdened.

COGITATIO

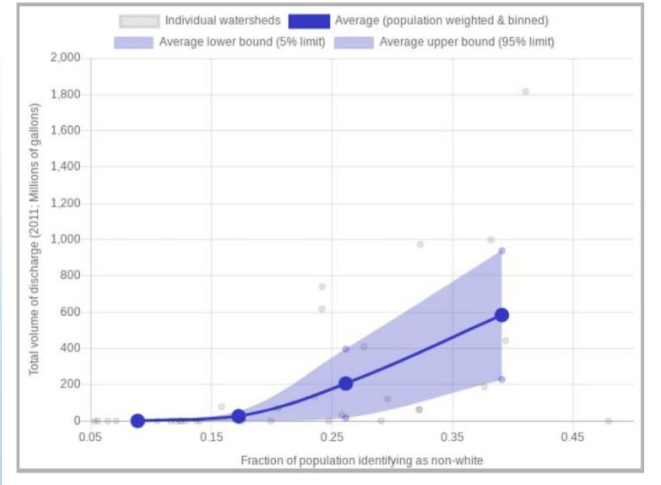
Media and Communication (ISSN: 2183–2439)
2019, Volume 7, Issue 3, Pages 91–103
DOI: 10.17645/mac.v7i3.2136

Article

AMEND: Open Source and Data-Driven Oversight of Water Quality in New England

Nathan Edward Sanders

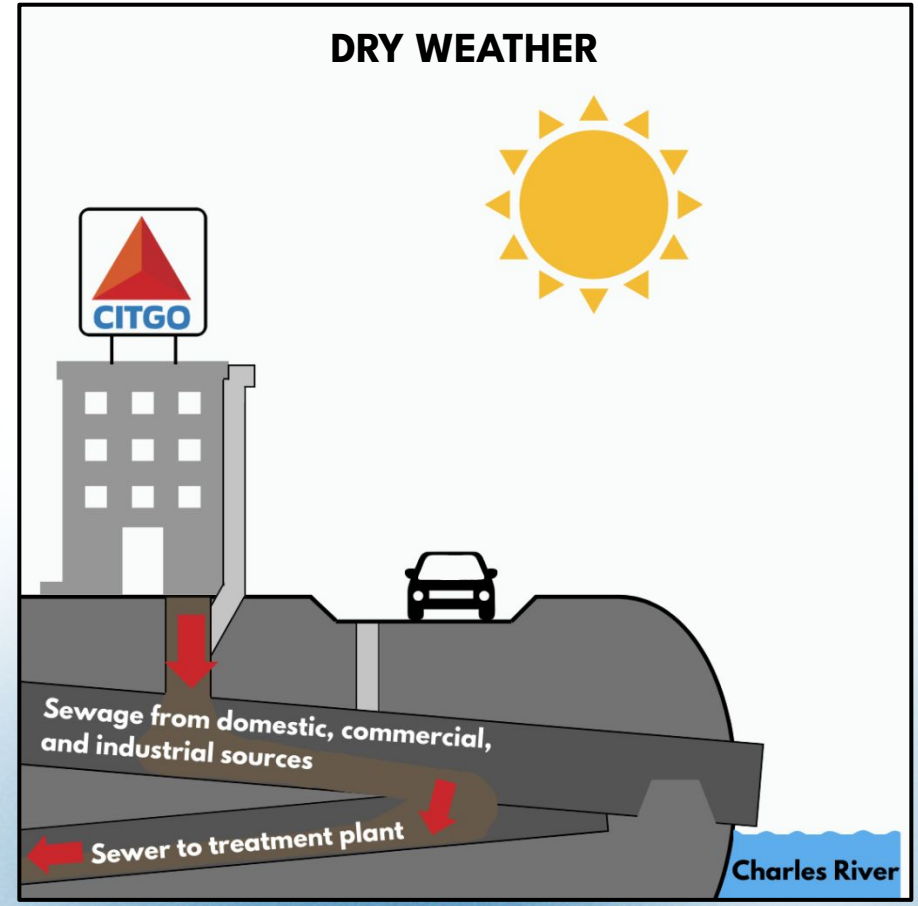
Mystic River Watershed Association, Arlington, MA 02476, USA; E-Mail: openamend@gmail.com

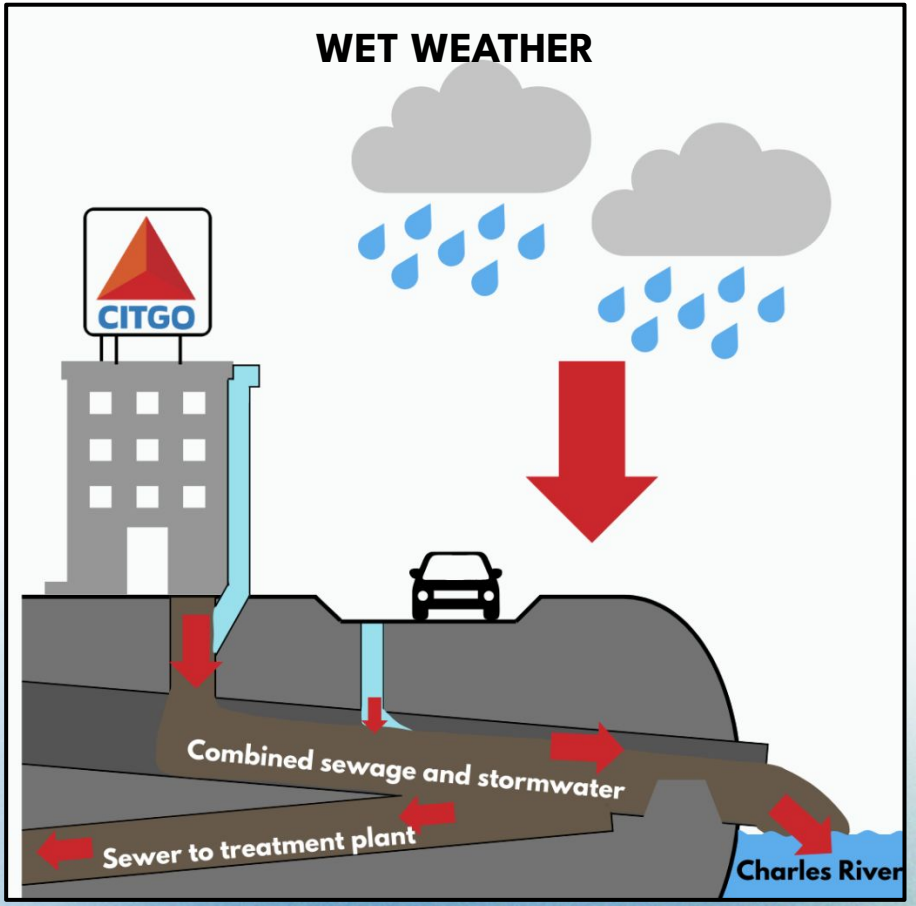


WHY DO WE HAVE CSOs?

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

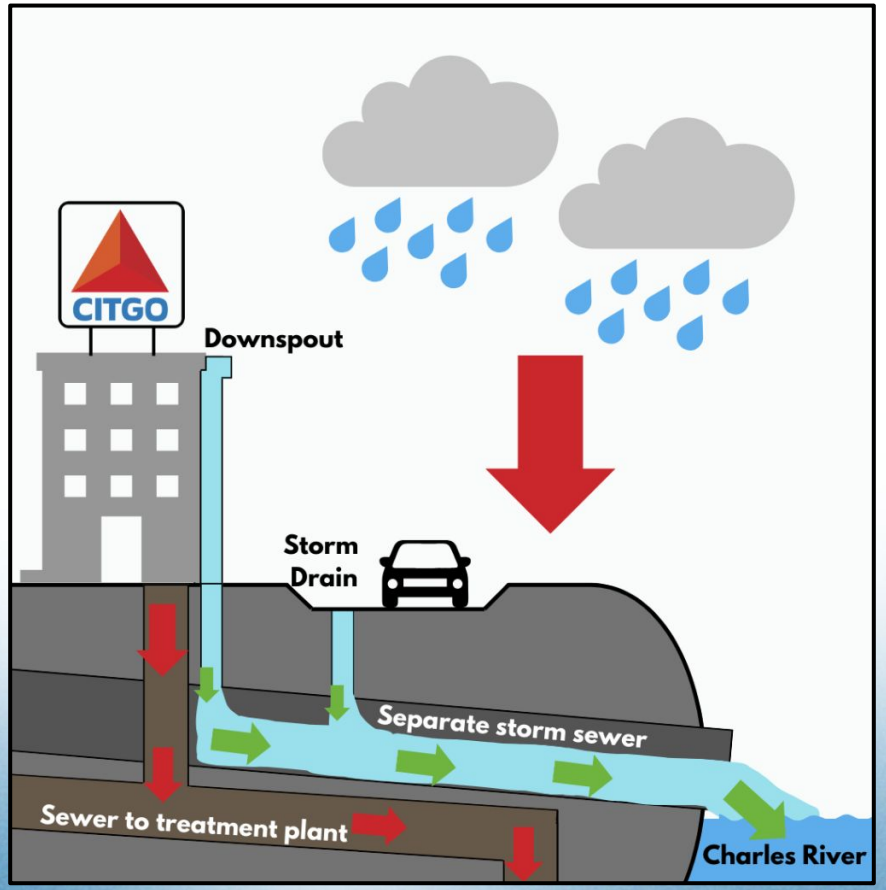




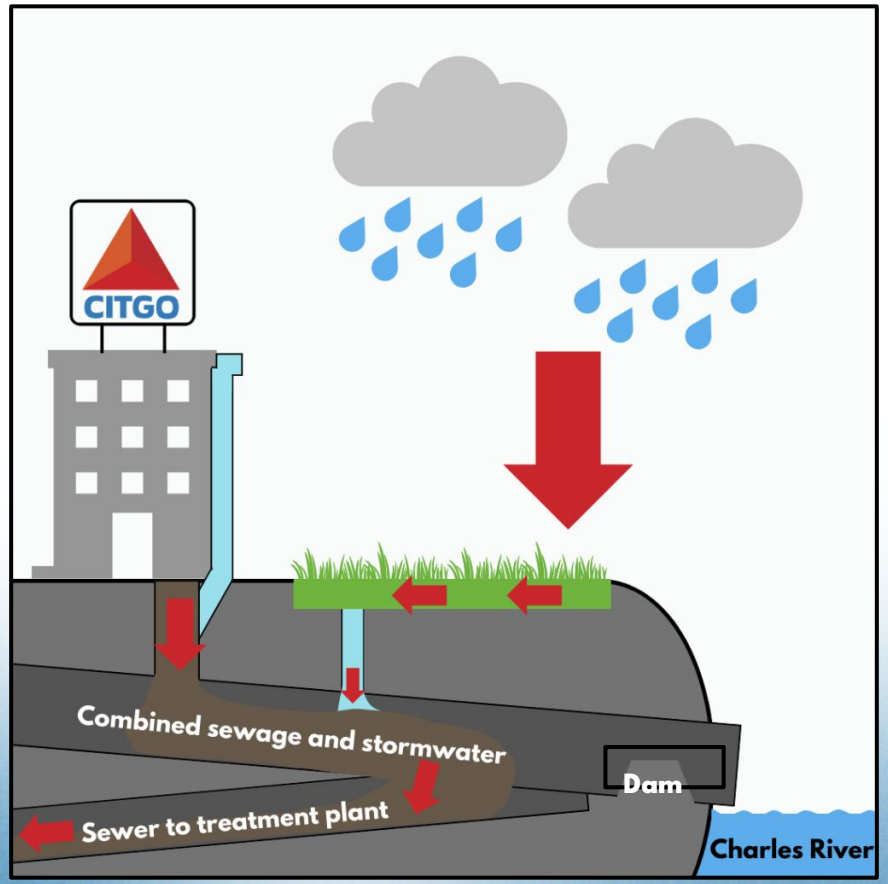
MODERN SEPARATED PIPES

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION



“SOURCE CONTROL” WITH GREEN INFRASTRUCTURE

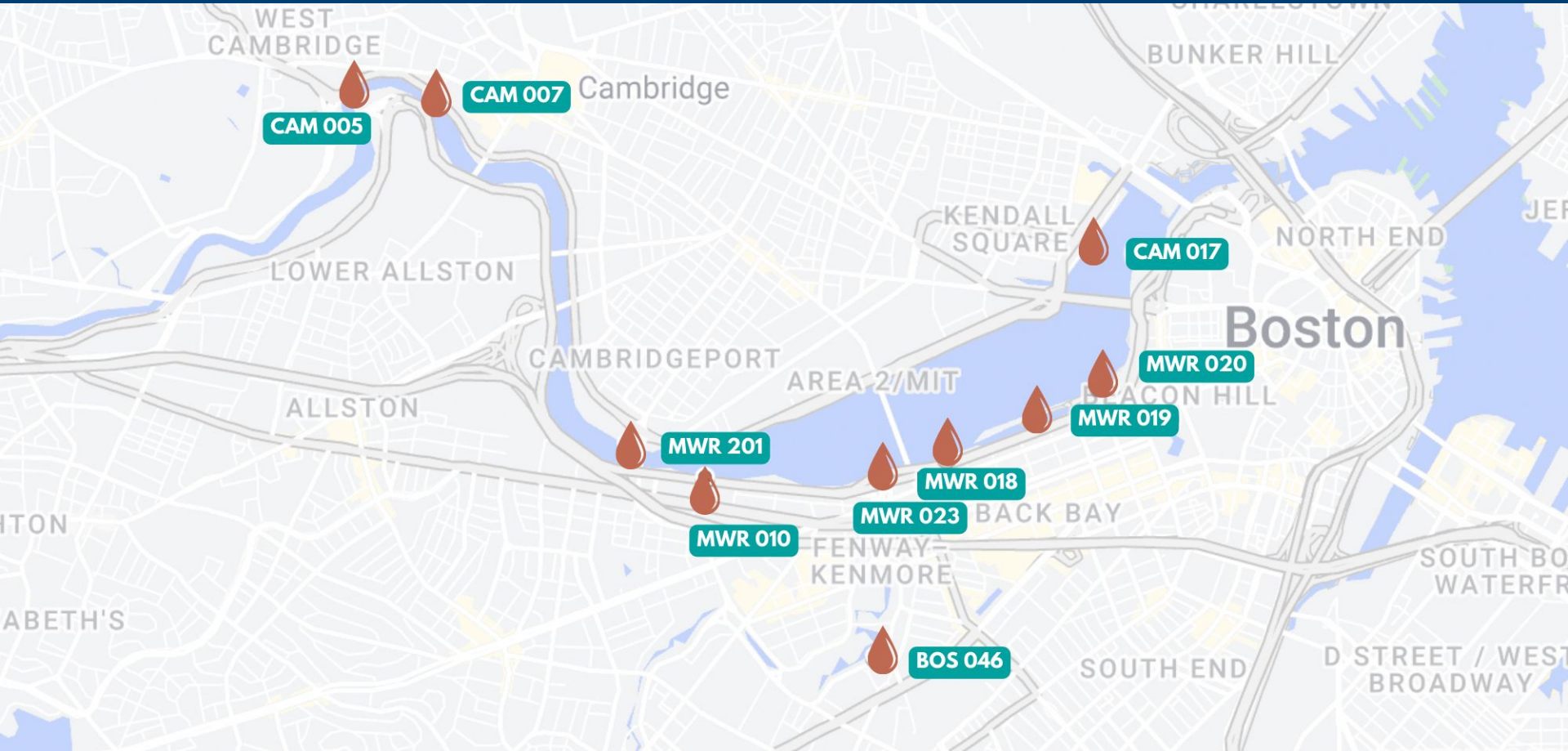


Charles River Watershed Association

Mystic River Watershed Association

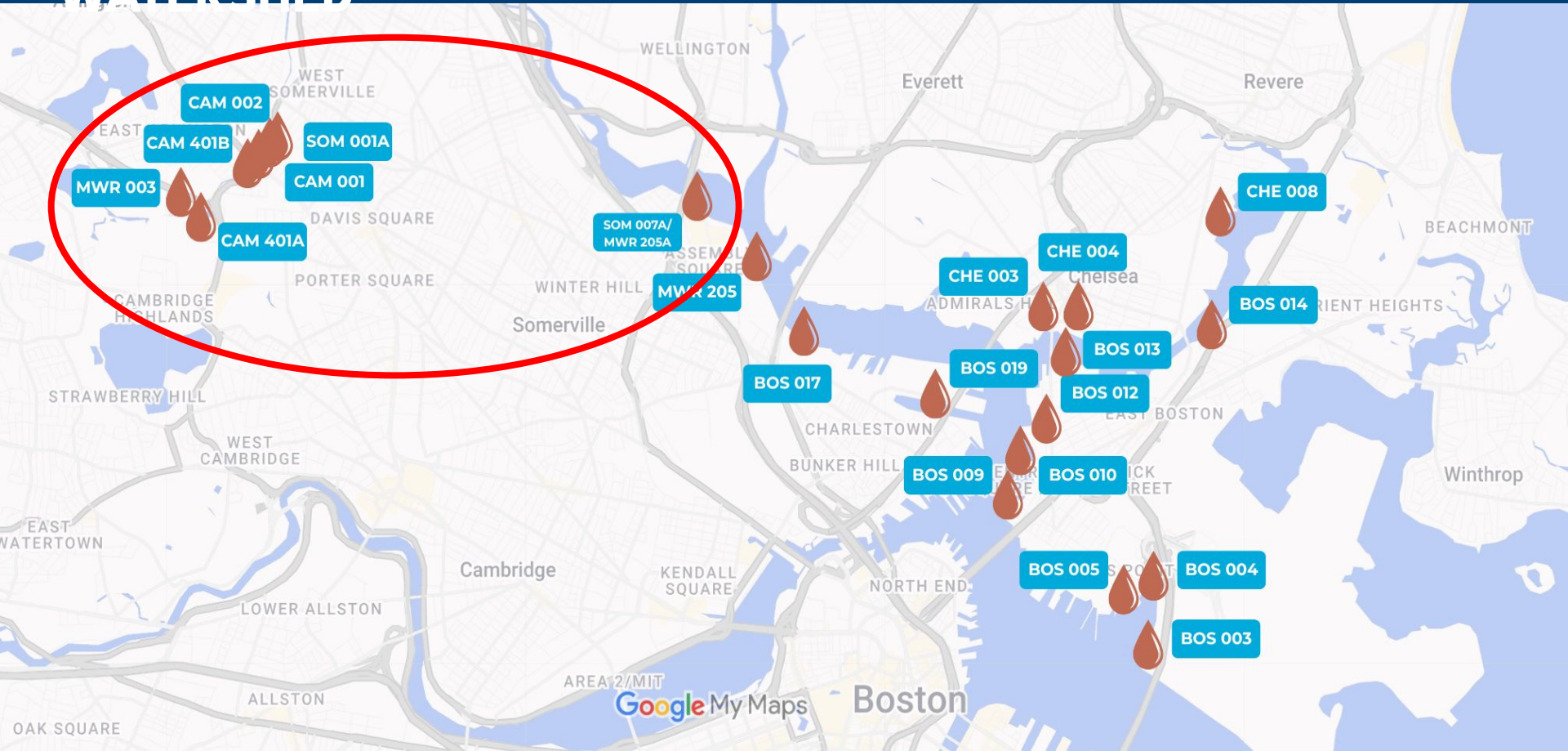
10 CSO OUTFALLS ON THE CHARLES

Charles River Watershed Association



21 CSO OUTFALLS IN THE MYSTIC WATERSHED

Charles River Watershed Association



LEVEL OF CONTROL

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

Updated Long Term Control Plan CSO Reduction /Elimination ("Level of Control") Options:

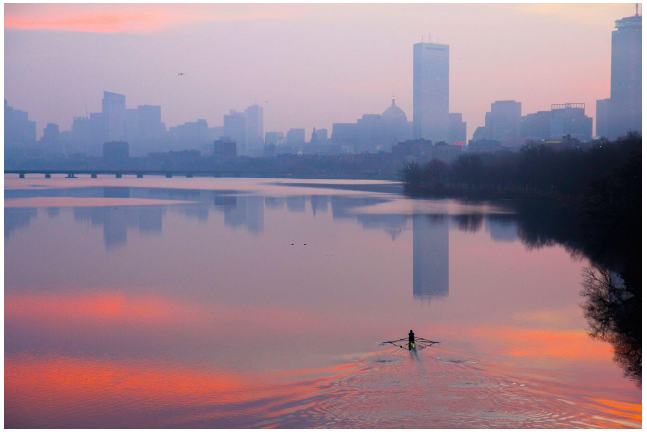
A. Some CSOs in the Typical Year

B. No CSOs in the Typical Year

C. No CSOs in a 5-yr (large) storm

D. No CSOs except in a (very large!) >25-yr storm

E. CSOs fully eliminated primarily through sewer separation



WHAT'S "THE PLAN"?

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

Updated Long Term Control Plan CSO Reduction /Elimination ("Level of Control") Options:

A. ~~Some CSOs in the Typical Year~~ 🤮🤮🤮🤮

B. No CSOs in the Typical Year

C. No CSOs in a 5-yr (large) storm

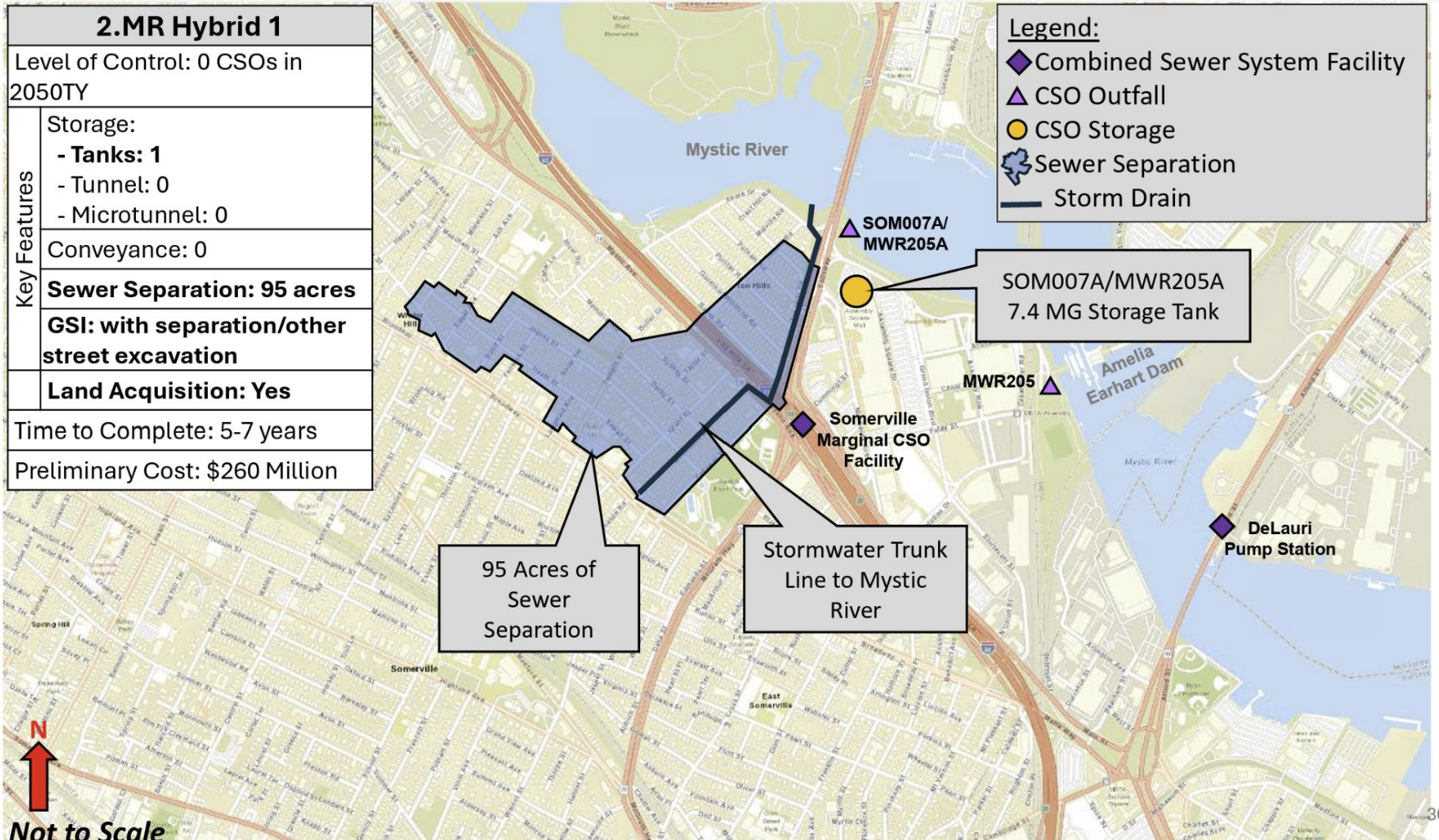
D. No CSOs except in a (very large!) >25-yr storm

E. CSOs fully eliminated primarily through sewer separation

WHAT IS THE "TYPICAL YEAR"?

- Standard method for assessing combined sewer overflow planning and compliance
- Simulated year of rainfall, includes all the days of a year numbered 1-356, some with no rain, others with storms of various sizes and intensity
- Used in the computer modeling of CSOs
- Usually based on historic rainfall, the "Typical Year" for the proposed plan does also include the anticipated impacts of climate change (termed the 2050 Typical Year)

2.MR Hybrid 1	
Level of Control: 0 CSOs in 2050TY	
Key Features	Storage: **- Tanks: 1** - Tunnel: 0 - Microtunnel: 0
	Conveyance: 0
	Sewer Separation: 95 acres
	GSI: with separation/other street excavation
	Land Acquisition: Yes
Time to Complete: 5-7 years	
Preliminary Cost: $260 Million	



3.AB Hybrid 2

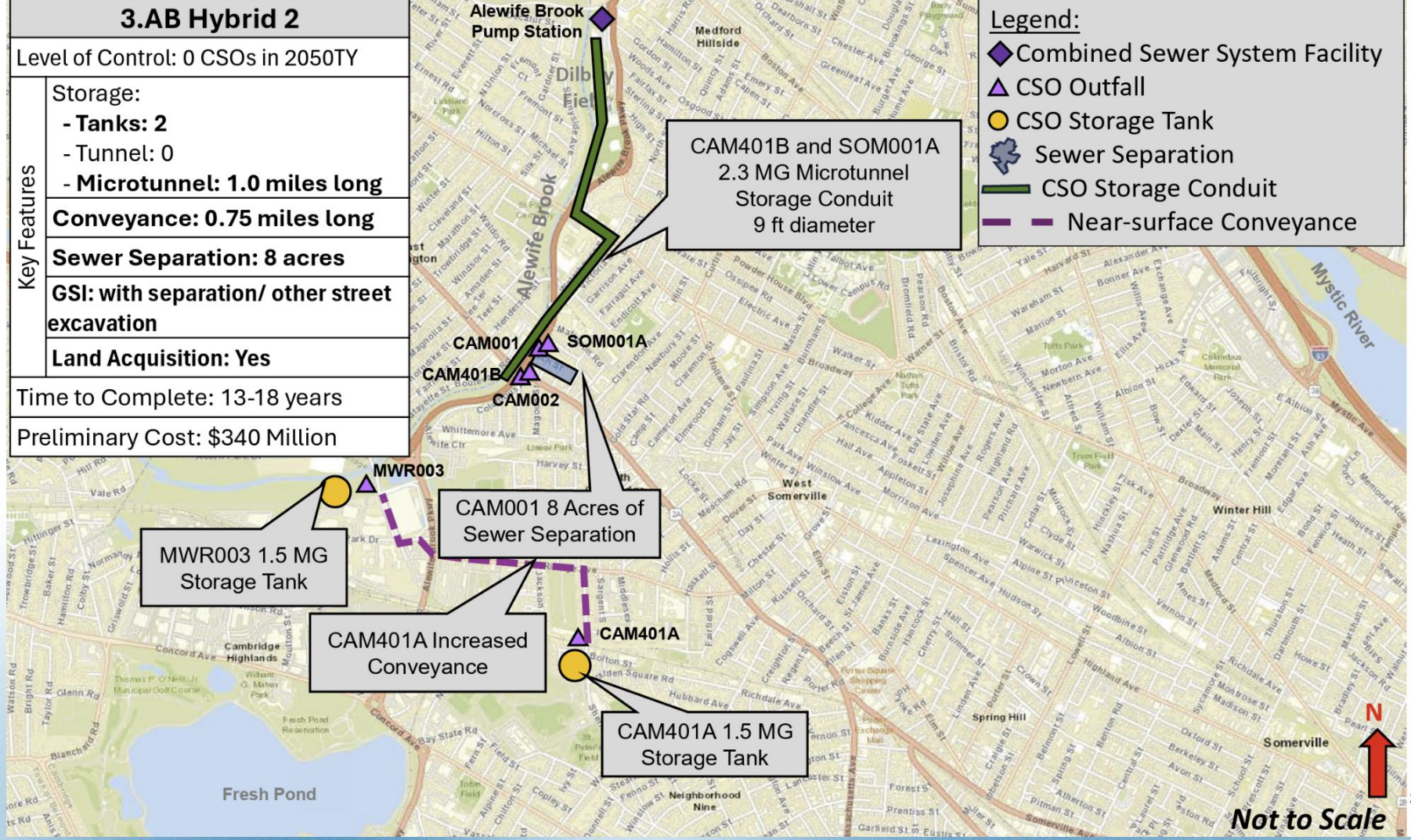
Level of Control: 0 CSOs in 2050TY

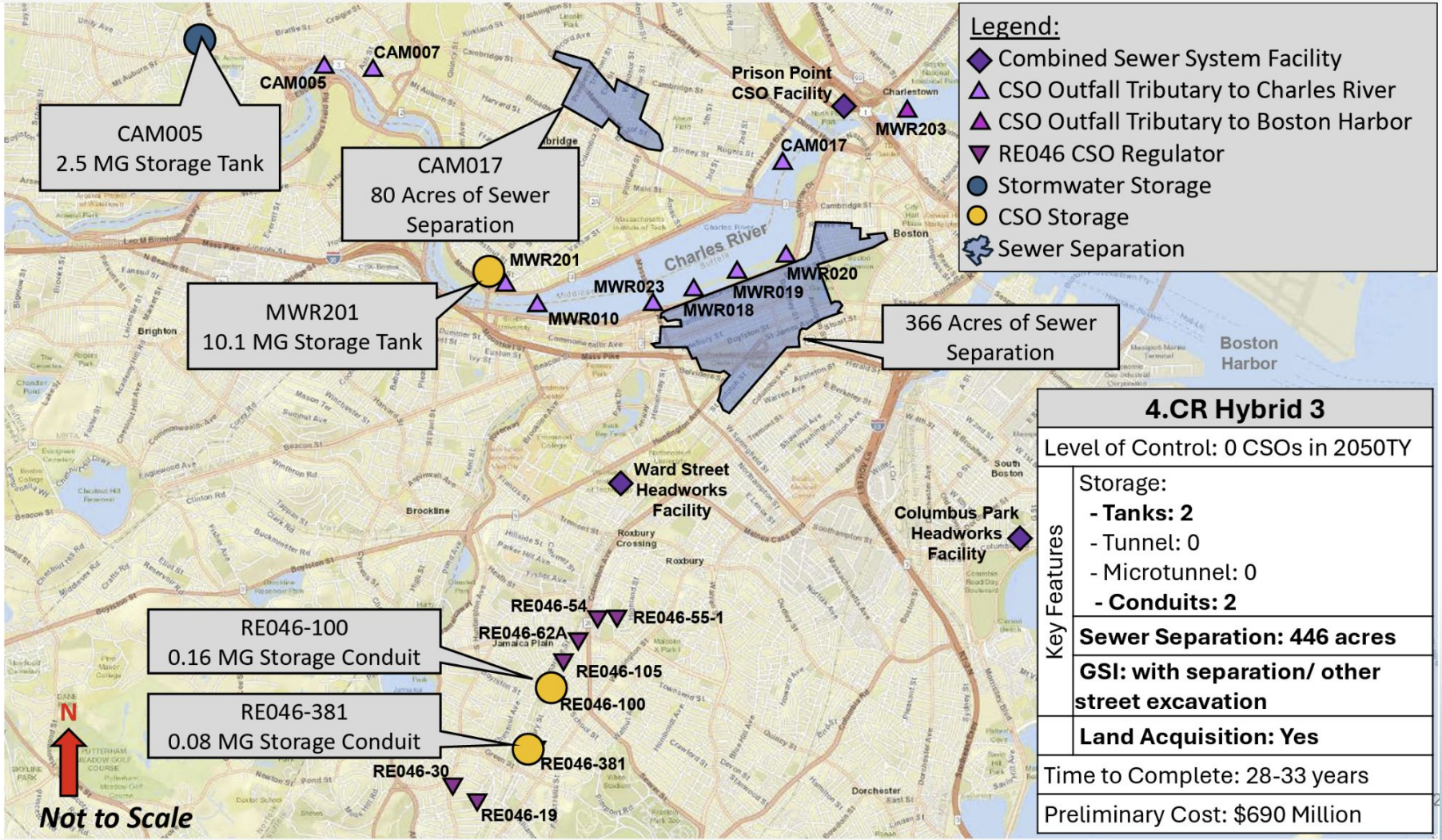
Key Features

- Storage:
  - **Tanks: 2**
  - Tunnel: 0
  - **Microtunnel: 1.0 miles long**
- **Conveyance: 0.75 miles long**
- **Sewer Separation: 8 acres**
- **GSI: with separation/ other street excavation**
- **Land Acquisition: Yes**

Time to Complete: 13-18 years

Preliminary Cost: $340 Million





4.CR Hybrid 3	
Level of Control: 0 CSOs in 2050TY	
Key Features	Storage: **- Tanks: 2** - Tunnel: 0 - Microtunnel: 0 **- Conduits: 2**
	Sewer Separation: 446 acres
	GSI: with separation/ other street excavation
	Land Acquisition: Yes
Time to Complete: 28-33 years	
Preliminary Cost: $690 Million	

MYTH #1: CSOs ARE ARE NO BIG DEAL!

MWRA frequently claims that CSOs are not really a problem in the Charles or Mystic River systems, blaming the problem on stormwater, while failing to share these facts

CONTACT WITH SEWAGE MAKES YOU SICK*

Charles River Watershed Association

Mystic River Watershed Association

Waterborne Pathogens, Associated Illnesses, and the Wastes They're Found In

Pathogenic Agent	Acute Effects/Chronic or Ultimate Effects[67]	Wastes[68]
Bacteria:		
Campylobacter jejuni	Gastroenteritis/death from Guillain-Barré syndrome	Human/animal feces
E. coli (pathogenic or enterovirulent strains)	Gastroenteritis/*E. coli* O157:H7, adults: death from thrombocytopenia; children: death from kidney failure	Domestic sewage
Leptospira	Leptospirosis	Animal urine
Salmonella typhi	Typhoid fever/reactive arthritis from certain strains	Domestic sewage
Other salmonella species	Various enteric fevers (often called paratyphoid), gastroenteritis, septicemia (generalized infections in which organisms multiply in the bloodstream)	Domestic sewage, animal wastes, food, compost
Shigella dysenteriae and other species	Bacillary dysentery	Human feces, domestic sewage
Vibrio cholera	Cholera/death	Domestic sewage, shellfish, saltwater
Yersinia spp.	Acute gastroenteritis (including diarrhea, abdominal pain)/reactive arthritis	Water, milk, mammalian alimentary canal
Viruses:		
Adenovirus	Respiratory and gastrointestinal infections	Domestic sewage
Astrovirus	Gastroenteritis	Domestic sewage
Calicivirus	Gastroenteritis	Domestic sewage
Coxsackievirus (some strains)	Various, including severe respiratory diseases, fevers, rashes, paralysis, aseptic meningitis, myocarditis	Domestic sewage
Echovirus	Various, similar to Coxsackievirus (evidence is not definitive except in experimental animals)	Domestic sewage
Hepatitis A	Infectious hepatitis (liver malfunction); also may affect kidneys and spleen	Domestic sewage
Norwalk and Norwalk-like viruses	Gastroenteritis	Domestic sewage
Poliovirus	Poliomyelitis	Domestic sewage

*stormwater may include some human sewage but includes lots of animal sources of bacteria as well and total bacteria concentrations are much lower

CONTACT WITH SEWAGE MAKES YOU SICK*

Charles River Watershed Association

Mystic River Watershed Association

wbur

Home / Local Coverage / Environment

Sewage discharges increase risk of hospital visits for residents near Merrimack River, study finds

May 28, 2024 By Barbara Moran

STORMWATER IS PERMITTED & HAS CONTROL PLAN

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

- Communities in the Charles & Mystic have a permit that requires them to reduce pollution in stormwater
- Illicit and illegal connection of sewer pipes to the stormwater system or to the rivers are already illegal and being tracked down and addressed
- Communities in the Charles are investing significant dollars ($30+ million in some communities) to reduce nutrient pollution, keeping CSOs would be literally pooping on these investments




FREQUENCY VS. SEVERITY

- MWRA argument that stormwater is the problem is based on time and the fact that water quality violations from stormwater are ***more frequent*** than those from CSOs
- MWRA does not explore the difference in severity of the water quality violations
- Sewage is a unique public health risk: carries pathogens

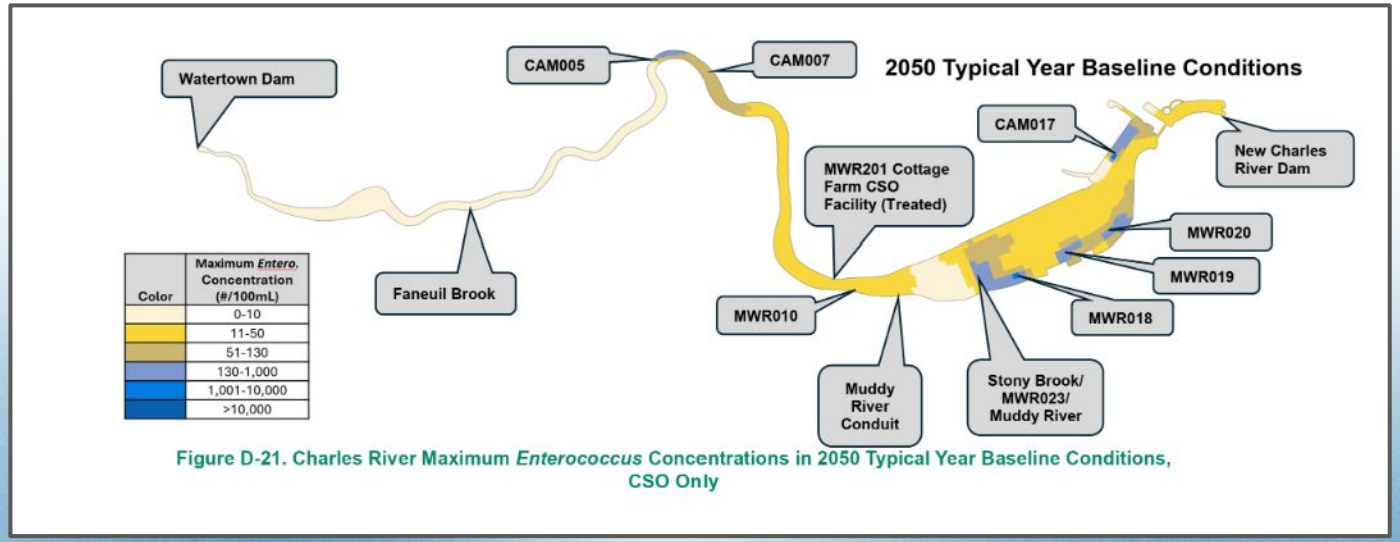
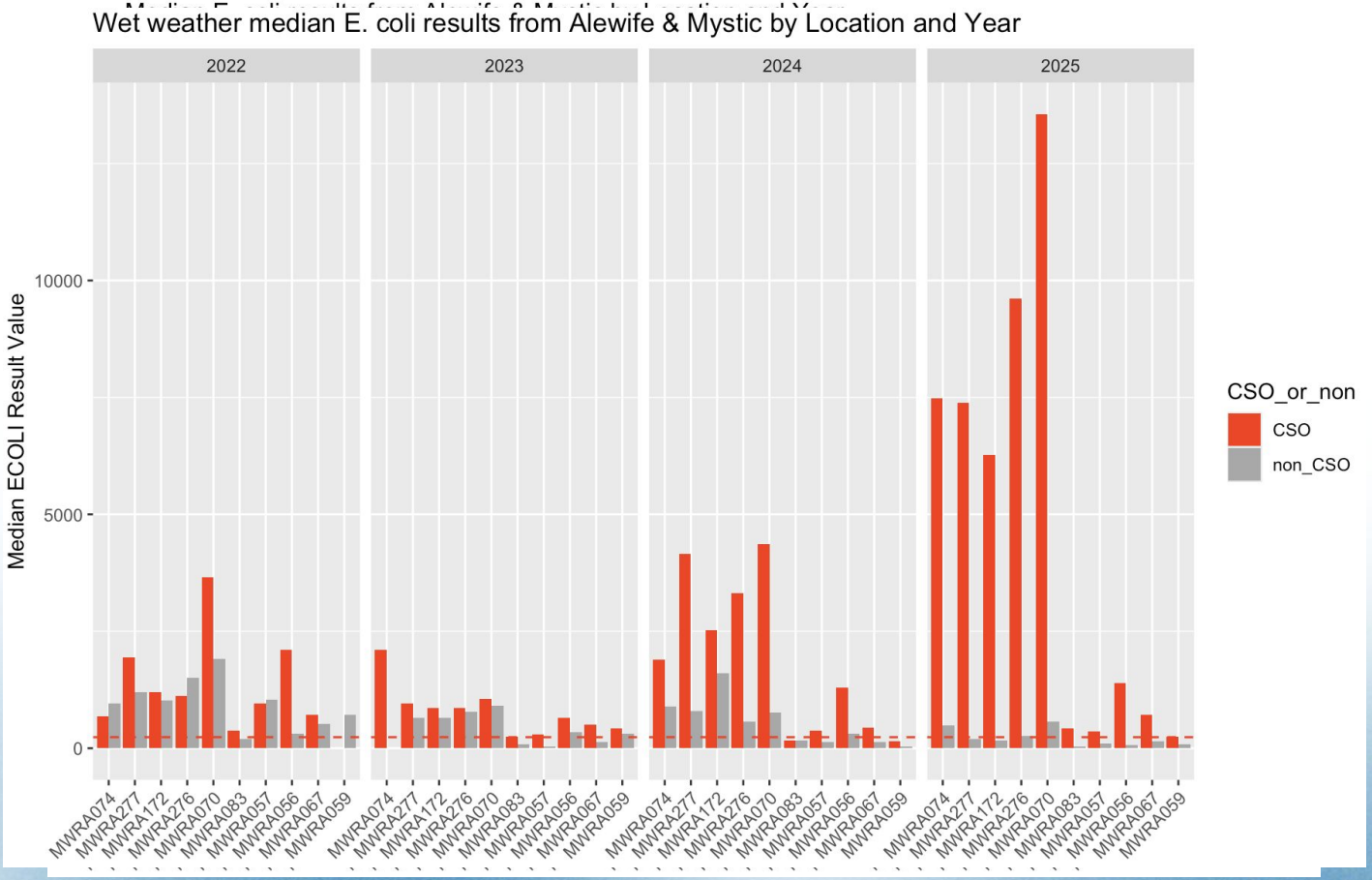


Figure D-21. Charles River Maximum *Enterococcus* Concentrations in 2050 Typical Year Baseline Conditions, CSO Only

WATER QUALITY IS MUCH WORSE ON DAYS FOLLOWING A CSO

Charles River Watershed Association

Mystic River Watershed Association



Bacteria concentrations on days of CSO + 48 hrs are **MUCH** higher than on all other days, including other “wet” days when it has rained .15” or more in the previous 48 hours

MYTH BUSTED

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

- Dumping untreated and partially treated sewage into the river via CSOs is a significant source of pollution in the Charles, Mystic & Alewife
- CSOs are a severe public health issue, a fact that is being ignored in this process
- We can and must address both stormwater and CSOs

MYTH #2: THEIR PLAN WILL RESULT IN 0 CSOS

The proposed plan will result in 0 CSOs in a “Typical Year”, but not 0 CSOs

DISCHARGES FROM REMAINING CSO SITES

- 10 active outfalls in the Charles
- 13.1 MG allowable in typical year
- Each site has limit for # of times it can overflow in typical year ranging from 0-3
- Typically MUCH more

2024 CSO in the Charles River

Outfall	Vol. (MG)	Activations
CAM005	0.20	4*
CAM007	0.13	1
CAM017	1.04	1
BOS046	2.17	5*
MWR201	43.00	5*
MWR023	0.21	2
MWR018	0.47	2*
MWR019	0.25	2*
MWR020	0.28	2*
Total	**47.75**	

Source: MWRA

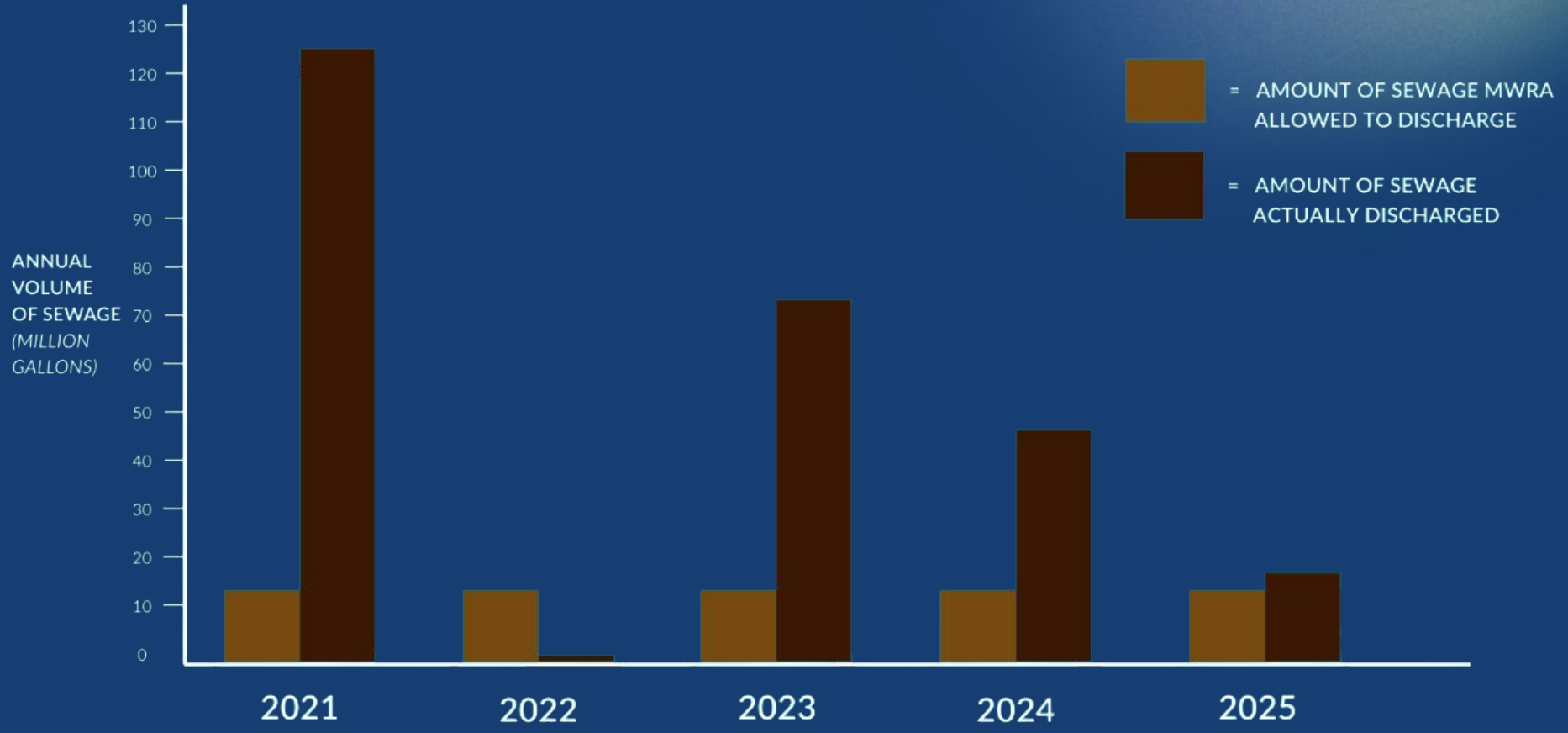
*Above the allowable annual number of overflows for the location

Mystic River Watershed Association

Sewage Pollution in the Charles River

MWRA Permitted Amounts VS Reality

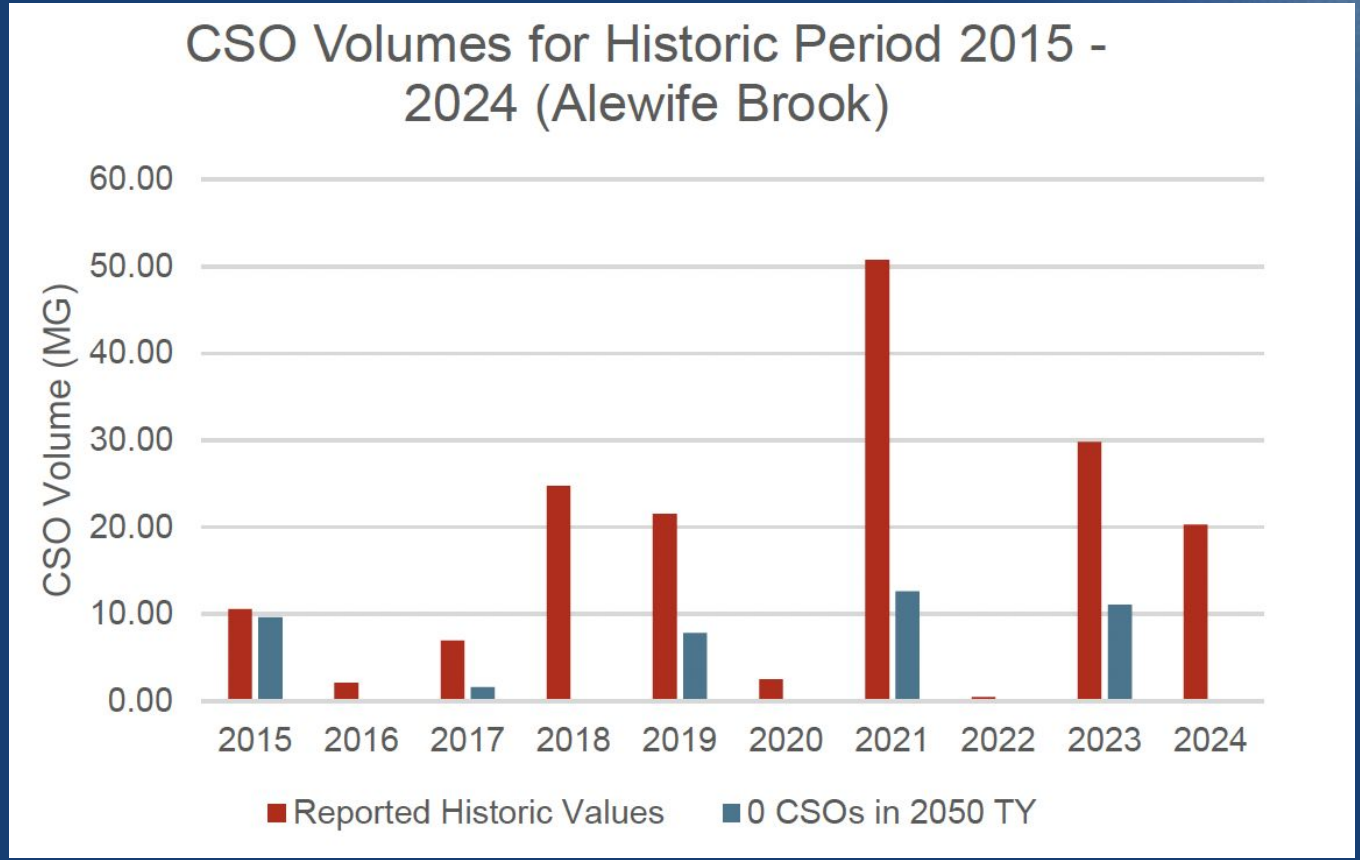
Charles River Watershed Association



Mystic River Watershed Association

ZERO CSOS IN A TYPICAL YEAR DOES *NOT* MEAN ZERO CSOS

Charles River Watershed Association



Blue bars show how the proposed plan would have performed over the past 10 years. *Source: MWRA*

AND climate change will **increase** the pressure on the system in the future, so this understates the scale.

MYTH BUSTED

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

- We will still have CSOs during large storms (larger than about 3”)
- We will still have CSOs in severe/intense storms (i.e. thunderstorms)
- CSO “elimination” or 0 CSOs in anything other than a 25-yr storm was successfully completed in Boston Harbor, we can do the same in the Charles & Mystic

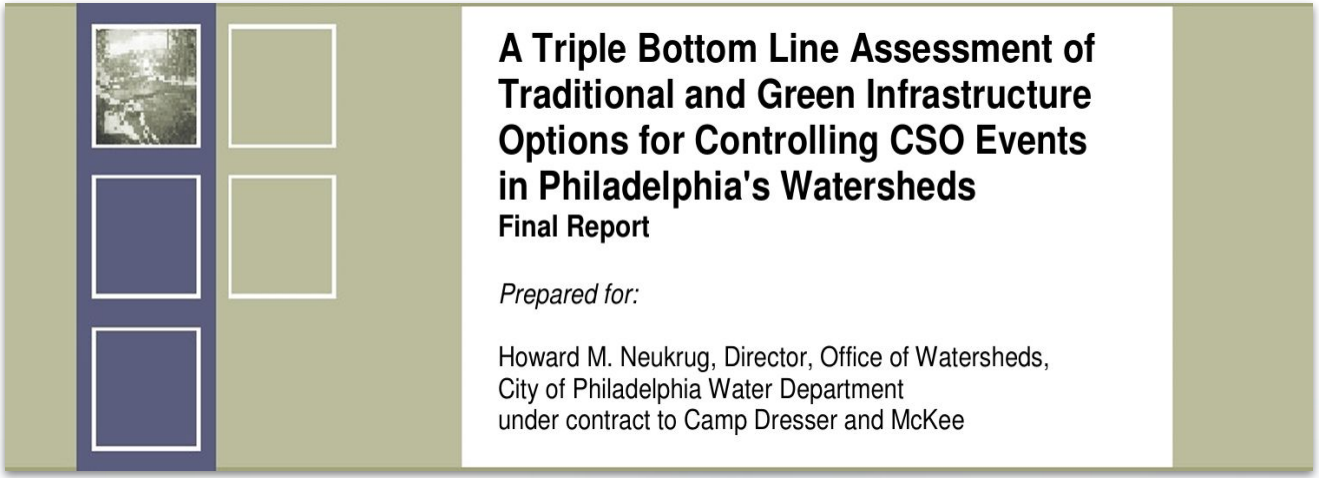
MYTH #3: THERE ARE NO BENEFITS TO REDUCING CSOS

MWRA is working hard to make the public think there are no benefits to CSO reduction; the truth is there are lots!

IN PHILADELPHIA

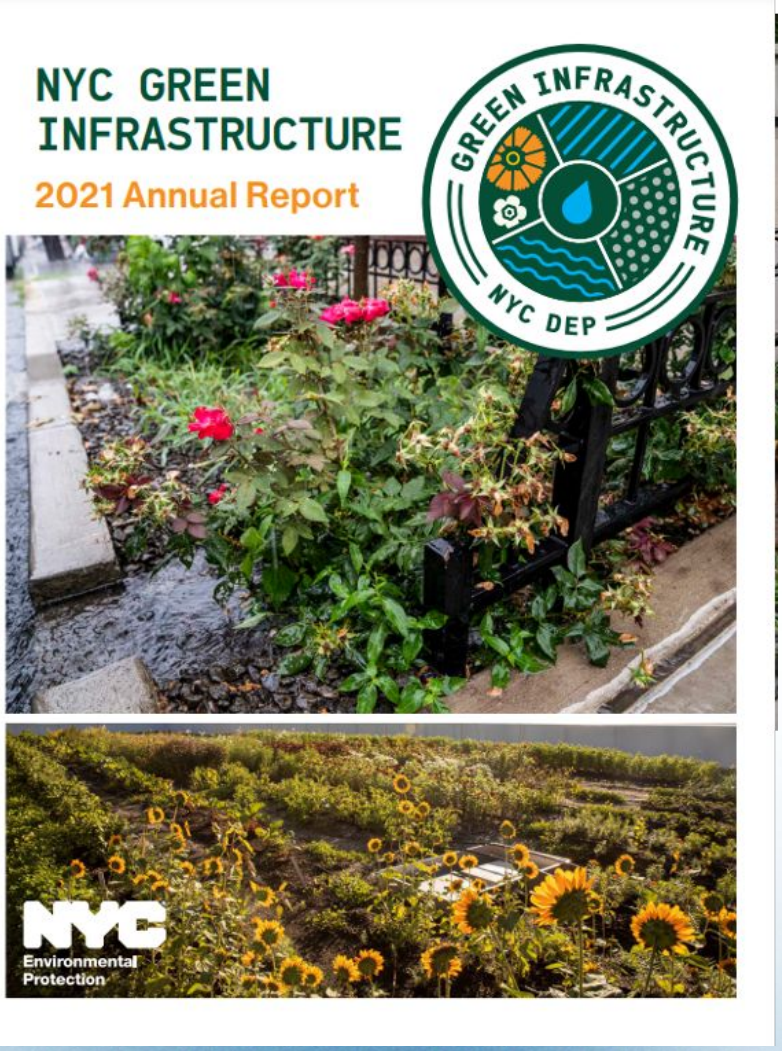
Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION



Benefits of green infrastructure evaluated and monetized include:

- **Improved recreation opportunities**
- **Reduced heat-stress related fatalities**
- **Improved air and water quality**
- **Green jobs**
- **Reduced energy use**
- **Reduced disruption due to construction and maintenance activities.**



Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

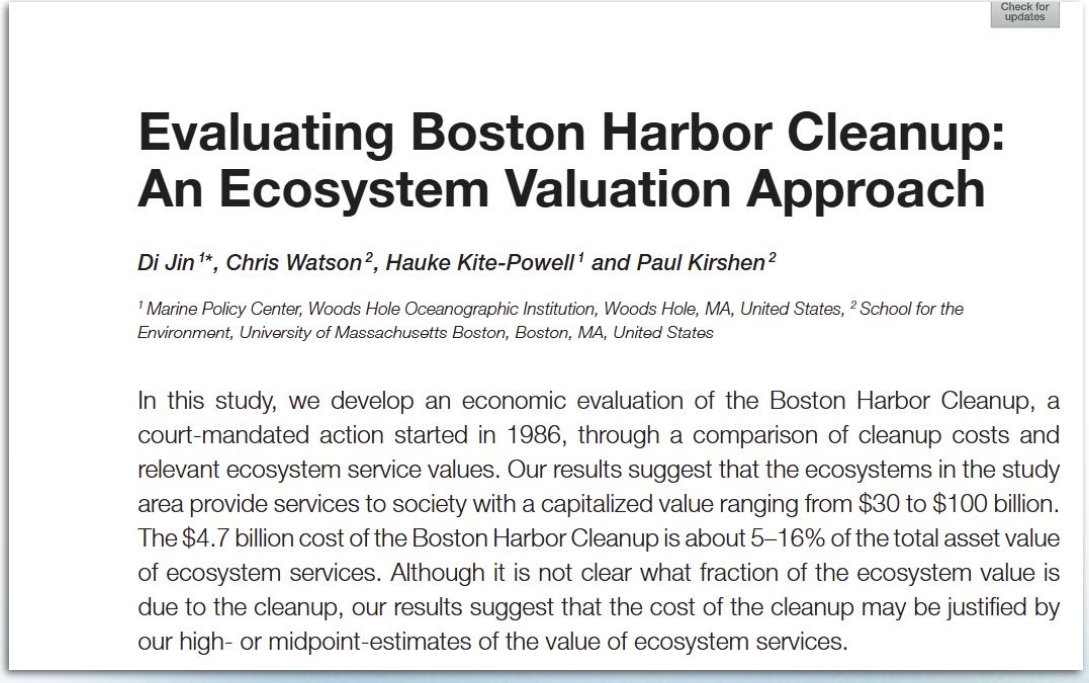
***"manage runoff from 10% of the impervious surfaces** in combined sewer watersheds through detention and infiltration source controls."*

IN BOSTON HARBOR

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

- The ecosystems in the study area provide services to society with a capitalized value ranging from $30 to $100 billion.
- The $4.7 billion cost of the Boston Harbor Cleanup is about 5–16% of the total asset value of ecosystem services.



Check for updates

Evaluating Boston Harbor Cleanup: An Ecosystem Valuation Approach

Di Jin [1], Chris Watson [2], Hauke Kite-Powell [1] and Paul Kirshen [2]*

[1] Marine Policy Center, Woods Hole Oceanographic Institution, Woods Hole, MA, United States, [2] School for the Environment, University of Massachusetts Boston, Boston, MA, United States

In this study, we develop an economic evaluation of the Boston Harbor Cleanup, a court-mandated action started in 1986, through a comparison of cleanup costs and relevant ecosystem service values. Our results suggest that the ecosystems in the study area provide services to society with a capitalized value ranging from $30 to $100 billion. The $4.7 billion cost of the Boston Harbor Cleanup is about 5–16% of the total asset value of ecosystem services. Although it is not clear what fraction of the ecosystem value is due to the cleanup, our results suggest that the cost of the cleanup may be justified by our high- or midpoint-estimates of the value of ecosystem services.

CSO "ELIMINATION" IN SOUTH BOSTON

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

North Dorchester Bay Storage Tunnel

Year Completed 2013

Cost $224.7 Million

Description Constructed a 10,832-ft., 17-ft. diameter soft-ground tunnel, drop shafts and CSO and stormwater diversion structures along outfalls BOS081-BOS087; 15-mgd tunnel dewatering pump station at Massport's Conley Terminal; 24-inch force main; and below-ground tunnel ventilation and odor control facility at the upstream end of the tunnel.

Water Quality Benefits **Eliminated CSO and separate stormwater discharges up to the 25-year storm and 5-year storm, respectively.**

MYTH BUSTED

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

There are numerous benefits from reducing and eliminating CSOs that have been observed and quantified both in Boston and in other cities. There are even more benefits from addressing CSOs with green stormwater infrastructure!

Benefits Include:

- Air & water quality
- Recreation
- Tourism
- Economic investment
- Human health

MYTH #4: IT'S TOO EXPENSIVE

MWRA is proposing investing $2B dollars to reduce CSO, for just $99 more per household per year, we could END CSOs.

Financial Capabilities Analysis: Required Element of CSO Plans

Municipal discharges that violate the Clean Water Act (CWA) **can pose significant threats to public health and the environment.** When a community is out of compliance with the CWA, **EPA's expectation is that the community will achieve compliance with the CWA as soon as practicable** (USEPA, 2024). The EPA has recognized the importance of **taking a community's financial capabilities into consideration when developing implementation schedules for achieving compliance** with the CWA standards and regulations. As a result, in 1997 the EPA issued the **"Combined Sewer Overflows: Final Guidance for Financial Capability Assessment and Schedule Development"** (USEPA, 1997).

Financial Capability and Rate Impacts

- All plans, all levels of control, other than complete sewer separation, deemed low or medium impact; entity would be considered financially capable of implementing
- No high impact results reported
- Rate impacts will vary depending on the level of control selected

Table 11-22. City of Somerville Projected Residential Indicator

	Baseline	Limited 2050 TY	2050 TY	2050 5-YR	2050 25-YR	Full Sewer Separation
FY 2026	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%
FY 2027	0.66%	0.69%	0.69%	0.69%	0.69%	0.70%
FY 2028	0.73%	0.76%	0.77%	0.76%	0.79%	0.81%
FY 2029	0.80%	0.84%	0.87%	0.84%	0.91%	0.95%
FY 2030	0.87%	0.93%	0.98%	0.93%	1.05%	1.11%
FY 2031	0.90%	0.99%	1.04%	0.97%	1.17%	1.31%
FY 2032	0.91%	1.01%	1.10%	1.00%	1.22%	1.54%
FY 2033	0.91%	1.03%	1.12%	1.04%	1.27%	1.65%
FY 2034	0.91%	1.03%	1.13%	1.07%	1.32%	1.76%
FY 2035	0.90%	1.02%	1.12%	1.11%	1.32%	1.88%
FY 2036	0.90%	1.01%	1.11%	1.14%	1.33%	2.01%
FY 2037	0.89%	1.01%	1.11%	1.18%	1.33%	2.08%
FY 2038	0.89%	1.00%	1.10%	1.21%	1.34%	2.15%
FY 2039	0.88%	1.00%	1.09%	1.25%	1.34%	2.22%
FY 2040	0.88%	0.99%	1.09%	1.29%	1.35%	2.29%
FY 2041	0.87%	0.98%	1.08%	1.27%	1.33%	2.36%
FY 2042	0.87%	0.98%	1.07%	1.25%	1.31%	2.42%
FY 2043	0.86%	0.97%	1.07%	1.23%	1.29%	2.43%
FY 2044	0.85%	0.97%	1.06%	1.21%	1.27%	2.44%
FY 2045	0.84%	0.95%	1.04%	1.19%	1.25%	2.45%
FY 2046	0.83%	0.94%	1.03%	1.18%	1.23%	2.46%
FY 2047	0.82%	0.92%	1.01%	1.16%	1.21%	2.47%
FY 2048	0.80%	0.91%	1.00%	1.14%	1.19%	2.48%
FY 2049	0.79%	0.89%	0.98%	1.12%	1.17%	2.49%
FY 2050	0.78%	0.88%	0.97%	1.11%	1.16%	2.50%
FY 2051	0.77%	0.87%	0.95%	1.09%	1.14%	2.51%
FY 2052	0.76%	0.85%	0.94%	1.07%	1.12%	2.52%
FY 2053	0.74%	0.84%	0.92%	1.06%	1.10%	2.53%
FY 2054	0.73%	0.83%	0.91%	1.04%	1.09%	2.54%
FY 2055	0.72%	0.82%	0.90%	1.03%	1.07%	2.55%

Cost/household or customer as % of median household income; >2% is deemed “high”

Financial Capability and Rate Impacts

Charles River Watershed Association

Mystic River Watershed Association

Table 8-5. CSO Control Scenario Summary

	Cost Summary		Regional FCA Results				
Alternative	CSO Control Cost (Millions)	Total Annual Cost Per Household	Residential Indicator	FCI Score	LQPI Score	Expanded FCA Matrix Results	EPA FCA Guidance Implementation Schedule
Baseline*	$0	$1,003	0.82%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule
Limited 2050TY	$329.6	$1,025	0.84%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule
2050TY	$763.7	$1,053	0.87%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule
Sewer Separation	$1,853.7	$1,125	0.92%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule
2050 5-yr	$1,727.4	$1,116	0.92%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule
2050 25-yr	$2,273.1	$1,152	0.95%	2.8	2.8	Low Impact	Normal Engineering / Construction Schedule

*Baseline CSO Control alternative represents existing cost/impact information if no CSO controls are implemented

FINANCIAL CAPABILITY & RATE IMPACTS

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

Table 8-5. CSO Control Scenario Summary

Alternative	Cost Summary			
	CSO Control Cost (Millions)	Total Annual Cost Per Household	Residential Indicator	FCI Score
Baseline*	$0	$1,003	0.82%	2.8
Limited 2050TY	$329.6	$1,025	0.84%	2.8
2050TY	$763.7	$1,053	0.87%	2.8
Sewer Separation	$1,853.7	$1,125	0.92%	2.8
2050 5-yr	$1,727.4	$1,116	0.92%	2.8
2050 25-yr	$2,273.1	$1,152	0.95%	2.8

*Baseline CSO Control alternative represents existing cost/impact information if no CSO controls are implemented

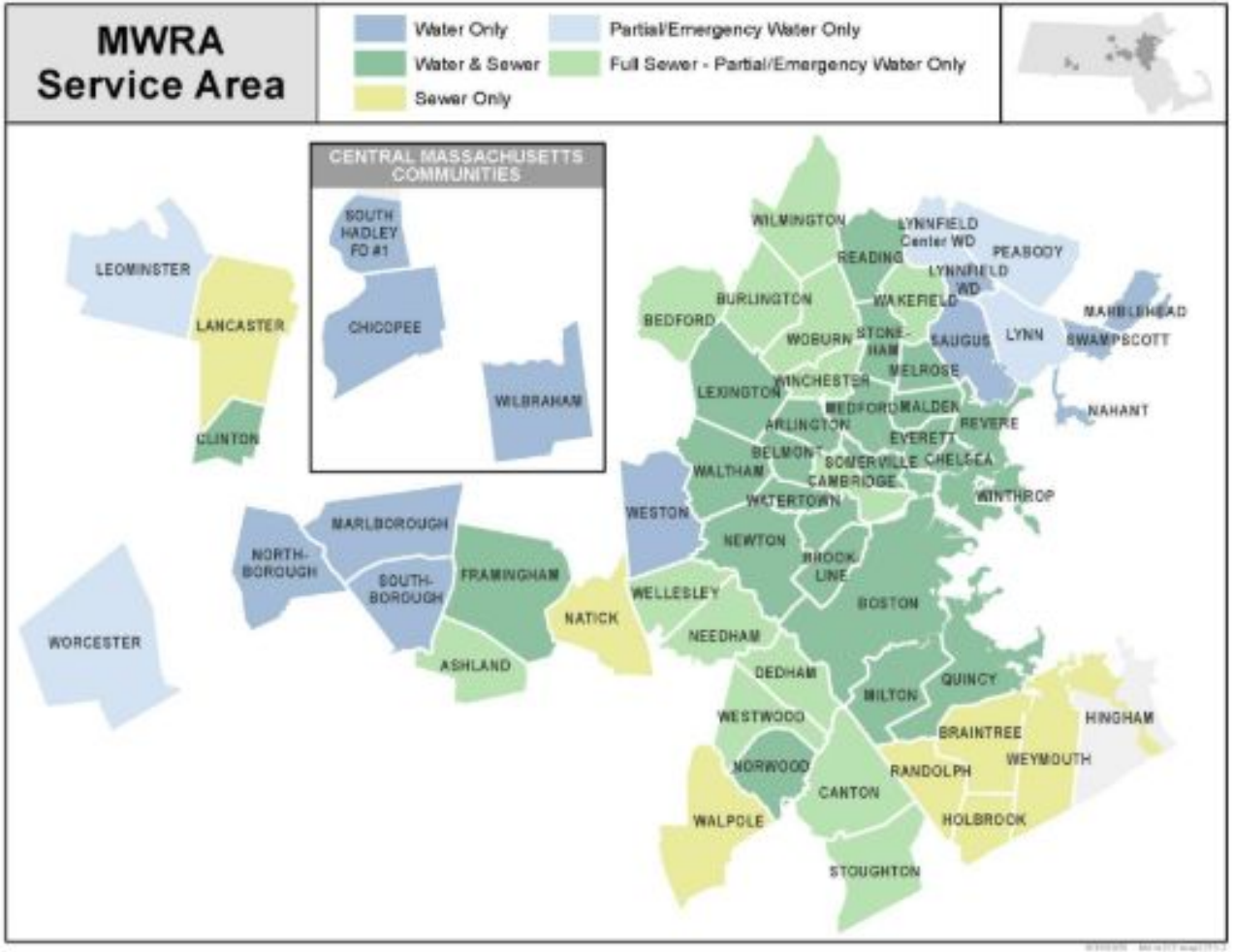
What customers would pay/year with NO CSO work = $1,003

What customers will pay/year under proposed plan = $1053

What customers will pay/year for CRWA/MYRWA preferred plan = $1152

Charles River Watershed Association

Mystic River Watershed Association



MYTH BUSTED

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

This is affordable by typical water infrastructure assessment method review protocols.

The difference in some improvement vs. ending CSOs for most rate payers is $99/year; <30 cents per day

Which is the Cost of…….

Medium Dunkins iced coffee and
Bagel with cream cheese per month

OR

1 Cannoli from Mike's Pastry per month

Charles River Watershed Association

Mystic River Watershed Association

MYTH #5: THIS IS THE BEST PLAN IN THE WORLD!

Greater Boston is leading the way, but we can do better! MWRA is comparing its work to cities that are DECADES behind Boston, of course we look better. MRWA is NOT comparing its work to cities that invested in fixing the problem and modernizing their infrastructure like Minneapolis.

WHAT DO WE WANT?

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

An End to CSOs

WHAT'S NEXT & HOW YOU CAN HELP

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

PUBLIC COMMENT IS OPEN TILL SEPTEMBER 30TH

- Visit **CutTheCrapCharles.org** to submit public comment, to tell DEP and EPA to reject the submitted plan from MWRA regarding sewage into the Charles

- Engage your local community (elected officials, conservation commissions etc) and urge them to send letters and participate in the public comment process to reject the current proposal.

- Help us expand our reach by connecting with local "Friends of" groups, environmental organizations, and green coalitions.

WHAT'S NEXT & HOW YOU CAN HELP

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION

PUBLIC COMMENT IS OPEN TILL SEPTEMBER 30TH

- Visit **MysticRiver.org/CSOs** to submit public comment, to tell DEP and EPA to reject the submitted plan from MWRA regarding sewage into the Mystic.
- Engage your local community (elected officials, conservation commissions etc) and urge them to send letters and participate in the public comment process to reject the current proposal.
- Help us expand our reach by connecting with local "Friends of" groups, environmental organizations, and green coalitions.

STOP COMBINED SEWER OVERFLOWS

Say no to sewage pollution! Tell our leaders that you demand a clean Alewife Brook and a Mystic River that is healthy now and in the future!

On April 30th, the Massachusetts Water Resource Authority and the cities of Cambridge and Somerville submitted a draft plan that allows the continued dumping of raw and partially treated sewage into the Mystic River, Charles River, and Alewife Brook (a tributary of the Mystic) for the foreseeable future. This threat will only worsen as climate change causes more frequent and more intense rainstorms.

NOW is the time to tell your leaders that we need a better plan – one that *eliminates* sewage pollution in our rivers.

A volunteer picks up trash next to a CSO outfall on the Alewife Brook at the Save the Alewife Brook Earth Day Cleanup

Submit Public Comment

The formal comment period is now open, and the Massachusetts Department of Environmental Protection (Mass DEP) and the U.S. EPA will host two virtual public hearings in September to solicit feedback.

CUT THE CRAP CAMPAIGN

Charles River Watershed Association

Mystic River WATERSHED ASSOCIATION


Mystic River
WATERSHED ASSOCIATION
Charles River
Watershed Association
Thank You!
Questions?

MWRA claims vs. reality

The sewage is only entering a small area of the Charles, very far downstream.

- The sewage is entering the Lower Basin of the Charles, which is recreationally the most heavily used water sheet in the country with ~1M people on the river each year.
- Environmental Justice communities are disproportionately affected.

We've reduced most of the sewage, we've done enough.

- The Clean Water Act set a goal of "fishable, swimmable" rivers. The goal was not rivers that only have sewage dumped into them sometimes. The law says no untreated sewage, the public wants no sewage, MWRA has not done enough, it's time to finish the job.
- MWRA's mission: "provide reliable, cost-effective, high-quality water and sewer services that **protect public health, promote environmental stewardship**, maintain customer confidence, and support a prosperous economy."
- We will have done enough when the CSOs are fully eliminated or "effectively eliminated", this was done at the Boston Harbor beaches, if it's possible there it's possible in the Charles.

MWRA claims vs. reality

The problem is stormwater, not sewage, and stormwater is not MWRA's responsibility.

- Stormwater is a major source of pollution in the Charles, but **cities and towns are spending millions to reduce it**.
- Stormwater carries an overabundance of nutrient pollution to the river, which is bad for river health, but **does not have concentrations of pathogens and viruses as sewage does**.
- Even if all stormwater pollution were eliminated, the Charles wouldn't support consistent swimming due to CSOs – **we must address BOTH stormwater AND CSOs.**
- **MWRA cannot adequately address CSOs without considering stormwater**, they are tying one hand behind their back before even getting started.
- Milwaukee's (and many other cities') water authority handles stormwater!
  MWRA should too, would allow regional approach to flood mitigation!

It will be too expensive.

- The public should get to decide what is worth investing in. $5B investment in a cleaner harbor has yielded many billions more in economic development and quality of life improvements. Let's see the real numbers, and impacts on rates, and let the public decide.

MWRA claims vs. reality

This was a collaborative process informed by public input.

- The team held public meetings but **did not listen to the input provided** defeating the purpose of the public meeting. The point of a public process is to listen and then incorporate feedback, the point is **not to hold a performative yet empty process** where the public is led to believe their input is valued but in reality is not.
- In public meetings and surveys, attendees expressed strong support for CSO elimination and use of green infrastructure. **The recommended plan does not reflect these preferences.**
- The team did not follow the intended timeline, members of the public were provided information and technical details **so late in the process that the team could not take or respond to input and feedback.**

Discharges are mostly treated sewage, so it's fine.

- Chlorinated sewage is moderately better than raw sewage… but still contains pathogens, pharmaceuticals, PFAS and more. Only fully treated sewage should be discharged into the environment.

What value do we place on a clean Charles?

Urban rivers are swimmable elsewhere

Portland OR, 2018

Paris, 2025

Why not the Charles?