

Claim #1

Reclassifying Charles and Mystic to B-CSO would have “little practical impact.”
“What’s important is what MWRA does to clean up the Charles, not what official category it’s assigned to.”

REALITY

This is patently false. If reclassifying the Charles and Mystic Rivers would not be impactful, the MWRA would not be so eager to do it. The classification of the waterbody directly informs what MWRA does (or does not do) to clean it up.

To understand why this is, it is important to understand some basics about how regulation of waterways works. The federal Clean Water Act (CWA) does not allow sewage to be discharged into rivers without express permission from federal and state regulators. The CWA also directs states (in our case, MassDEP) to set “water quality standards,” which describe the desired condition of a water body and the means by which that condition will be protected or achieved. State water quality standards classify the Charles as a “Class B” waterbody, which means no amount of combined sewer overflows (CSOs) are allowed. Among other things, Class B waterbodies are supposed to be safe for recreational use—swimming, boating, fishing, and more—activities which clearly are made unsafe by sewage in the river.

Acknowledging that infrastructure upgrades take time, MassDEP allows CSO discharges to the Charles on a temporary basis, while progress is made toward elimination. The regulatory process by which this is accomplished is the issuance of a “variance” to the water quality standards. A variance is NOT a get-out-of-jail-free-forever card; polluters must demonstrate ongoing progress towards resolving the problem in order to receive variances. The first Charles River variance was granted in 1998, and additional variances lasting 3-5 years have been granted ever since, most recently in 2024 (expiring in 2029)....



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REALITY continued...

Reclassifying the Charles as a “Class B(CSO)” waterbody, as MWRA has proposed, would remove MWRA’s legal obligation to eliminate these sewage discharges (which is exactly why MWRA is so interested in achieving this regulatory change). This is because classification of Class B(CSO) waterbodies establishes the ongoing presence of CSOs as the status quo. It is a permanent qualifier that essentially says “recreation is only safe when there is no sewage in the river” and leaves it at that; there is no ongoing obligation to eliminate the pollution, and therefore no expectation that the river will ever be safe for recreation all the time.

And this is not theoretical. The Muddy River, a tributary of the Charles that flows through Brookline and Boston, was classified as a B(CSO) waterbody in 1997. In practical terms, what that has meant for the Muddy River is that there is no current legal requirement to eliminate discharges from the CSO there, even though CSOs remain a significant source of water pollution and likely have downstream impacts on the Charles River. A downgrading of the Charles to B(CSO) would consign it to the same fate.

MWRA is not going to clean up the Charles, Mystic, and Alewife out of the goodness of its heart; it will do what it is legally required to do. Despite regularly boasting about their impressive past achievements, the MWRA has abruptly reversed course and is now proposing to erase those impressive gains by dumping more sewage into the river in the decades to come. MWRA is dismissing the public health impacts this will have on future generations, just to save a relatively small amount of money.

Claim #2

Sewage is still “leaking” into the Charles River.

REALITY

Sewage is not “leaking.” Rather, the MWRA and the cities of Cambridge and Somerville are purposely dumping large volumes of it into the Charles River, Mystic River, and Alewife Brook, when it rains. The Authority and the two cities are using these water bodies as relief valves for outdated sewer systems that are not able to handle the volume of wastewater and rainwater runoff generated by the densely developed areas they serve.



In other words, the system is designed to send sewage into the rivers. For context, the Charles was deemed unsafe for recreation for 28 days in 2023, or approximately one month; 20 days in 2024; and 16 days in 2025 due to CSOs.

Claim #3

“Using a 2050 prediction model, the MWRA says it would eliminate CSOs in the Alewife Brook entirely.”

REALITY

This is patently false. While MWRA is predicting that there would be “zero CSOs in a 2050 typical year” under their recommended plan, it is important to understand what a “typical year” is (and is not), as used in this context. A “typical year” is a model of precipitation patterns that MWRA thinks will represent average conditions in 2050.



But by definition, half the years covered by the model will be above average in frequency and intensity and volume of rain—this is how averages work. MWRA has told us they have not modeled out what this would mean, say, over a ten-year period in terms of actual CSO discharges; we think they should be required to do so. What we do know is that MWRA’s draft plan would ensure the release of CSOs to all three waterbodies, including the Alewife Brook, in some if not most years, but MWRA fails to provide details about how much and how often these future CSOs will occur.

Claim #4

“Using a 2050 prediction model, the MWRA says it would . . . reduce untreated CSOs by 85 percent in the Charles, and, in the Upper Mystic, cut them down from a predicted 30 million gallons per year to less than 7 million.”

REALITY

This is not true, and it is not even what the MWRA has claimed. The current plans would not improve the current condition. They are in fact backsliding. The volumes they predict for the Charles and Mystic in the typical year are greater than allowed today by EPA and DEP.



MWRA is predicting only that the plans would reduce volumes in the Charles and Mystic by those stated amounts under modeled 2050 conditions as compared to what CSO volumes would be in the future if no further work were undertaken. It is important to understand that factored into those numbers are assumptions about stronger storms coming in the future; MWRA teams themselves predict that total volumes of CSOs in 2050 would increase by 2 to 4 times what they are today if nothing further is done to reduce them. In other words, a substantial increase in volume is built into the assumptions—so yes, if MWRA makes some level of effort to mitigate CSOs, volumes in the future will be less than they would have been in the future if no further mitigation efforts were made. But this is not the same as saying future volumes will be less than they are today, and in fact, this is not what MWRA is saying. The important number to look at is the actual predicted volumes, rather than percent reductions (which depend on what you are comparing). And when you look at the predicted volumes in a “typical year” (read: average), you realize that they will be greater than currently allowed under the current Long Term Control plan.

Note that because MWRA is not telling us what the performance would be like in non-typical years, as discussed above, we don’t even know what the total volumes will be over, say, a 10-year period in 2050.

Claim #5

The water quality variances the MWRA has been receiving since 1998, allowing it to dump sewage into the rivers in violation of the Clean Water Act, are a “charade.”

REALITY

As noted above, the water quality standards variances were designed to give the MWRA time to make necessary infrastructure upgrades to end sewage discharges. While not a perfect solution, these variances have provided considerable transparency into a complex process and have allowed regulators to force MWRA and Cambridge to do more than they were initially willing in order to



protect public health—e.g., providing public notifications when CSOs occur to let people know that the river is full of sewage—and to seek cost-effective green infrastructure solutions. Importantly, the current variance requires the entities to develop an updated CSO control plan that takes climate change into account.

The Globe’s language seems to reveal what MWRA thinks of the variances. The plan proposed by MWRA shows that they are not ultimately interested in achieving the goal of a sewage free river—which is the purpose of the variance—but instead took advantage of this process to buy themselves time up until October 2025, when they proposed changing water quality standards and dumping sewage into the Charles forever. If there is any “charade” occurring here, it is MWRA’s. In a November 17, 2025 letter, MassDEP made it clear that the agency does not view the variance process as a charade and that a variance requiring MWRA to develop a plan to continue to reduce CSOs into these rivers means exactly that—and a plan to dump more sewage will not be accepted as meeting this requirement.

Claim #6

“According to the EPA, the difference does not connote a ‘significant downgrading of water quality.’”

REALITY

As noted above, reclassifying a river from Class B to Class B(CSO) is indeed a significant step toward worse water quality. The document linked to by the Globe is not an official communication from EPA, rather it is a report to Congress by an unidentified



author. If the Globe was interested in the views of EPA or MassDEP on a possible reclassification of these rivers, they could have reached out to EPA and/or MassDEP to ask them directly, as part of their due diligence before writing their editorial. However, they chose not to do that.

Claim #7

“Even if all the CSOs closed tomorrow, the watersheds of Greater Boston would still have major problems, and it would not necessarily be fishable and swimmable at all times — the goal of river advocates. Fertilizer runoff from lawns, motor vehicle oils from parking lots, pet waste, and other pollutants still make their way into the Charles and other Greater Boston rivers regularly, while climate change is predicted to increase precipitation by huge margins in the coming decades. The MWRA can’t clean up the Charles and Mystic rivers by itself.”

REALITY

No one is asking the MWRA to clean up the Charles and Mystic Rivers by itself. The other major source of pollution into the Charles River, Mystic River, and Alewife Brook is stormwater itself, and existing law obligates cities and towns to reduce pollution from stormwater, obligations they will continue to invest in for decades.



All municipalities are required by The EPA to find and eliminate othersmall-scale sources of sewage contamination of the stormwater system. In the Charles, cities and towns have additional requirements to reduce phosphorus pollution by dramatic amounts. EPA has proposed similar requirements on municipalities in the Mystic and the Alewife. In addition, the US EPA proposed an additional requirement on large property owners in the Charles, Mystic and Neponset watersheds to reduce pollution from stormwater runoff from their own properties. So other entities are doing their part, at significant cost, to reduce pollution into these waterways. We are asking MWRA to do its part and stop dumping sewage into these waterways.