



October 23, 2025

Via email

Massachusetts Water Resources Authority
2 Griffin Way
Chelsea, MA 02150

Re: Combined Sewer Overflow Long Term Control Plan

Dear Members of the MWRA Board of Directors,

I am writing on behalf of Charles River Watershed Association (CRWA) and our over 13,000 members and supporters, most of them residents of the MWRA water and/or sewer service areas. CRWA was founded sixty years ago by a group of residents committed to the cleanup of the Charles River, and we have played a significant role in advocating for a cleaner Charles ever since.

According to a October 23, 2025 slide deck prepared by Somerville city staff for their city council and posted online, the parties (MWRA, Somerville and Cambridge) are going to be recommending that for the next Long Term Control Plan, in the Charles River, the lowest level of CSO controls among the five options under consideration, ensuring sewage discharges continue on a regular basis and in fact more than double in volume in the coming decades¹.

CRWA has been an active participant in the updated Long Term Control Plan process dating back to providing comments on the original scope included in the previous Charles River water quality standards variance.² We have attended every meeting we have been made aware of and provided input to the process at every opportunity, including making our own opportunities for comment and feedback.

After seeing the “preferred alternative” being recommended by the MWRA staff, the only logical conclusion is that MWRA has chosen to completely disregard the views of CRWA, the thousands of residents we represent, and indeed the thousands more area residents who have waited

¹ The current Long Term Control Plan allows 13.1 million gallons in a typical year, the preferred alternative will allow 27.7 million gallons of untreated or inadequately treated to dump in the river annually. The current LTCP requirement of 13.1 MG in a “Typical Year” means that in an actual year overflows to the Charles River regularly reach or exceed 50 MG/year. In 2021, 126 million gallons of sewage was dumped into the river, 72 MG in 2023, and about 48 MG in 2024. Finally, in 2025 to date, a year the watershed is in a drought, the 13.1 MG has already been exceeded.

² As a reminder, the variances MWRA has received from state and federal regulators are **short-term** modifications of the Massachusetts surface water quality standards that allow **limited** CSO discharges while MWRA works to come into full compliance with the standards and criteria of the Charles River’s Class B designation. The variances are **not** intended to be the status quo or a long-term solution to allow sewage dumping into the Charles River forever.

Charles River Watershed Association

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decades for the “swimmable” Charles promised by the 1972 Clean Water Act and the 1995 Clean Charles Initiative. Indeed, the hours that we and our members have spent interacting with MWRA in a public process we mistook for a genuine opportunity to engage with the MWRA team seem to have been a complete waste of our time.

At the October 22, 2025 MWRA Board meeting, there was much self-congratulation on the number of meetings held and surveys conducted. Yet, from our perspective as very active participants, virtually nothing recommended by us or other members of the public in those meetings and surveys was taken into account to inform selection of the preferred alternative. Instead, some select comments—taken out of context—are being used as justification to advance the cheapest option that allows MWRA to dump the most sewage into the river. The point of public engagement is not to have a performative yet empty process, the whole point is to truly listen to what people say they want, and then do it. Your staff even noted that the survey showed people expressed a preference for green infrastructure, for nature based solutions, for a plan that builds resilience to climate change. The preferred alternative does not represent these values.

We know the public wants to end sewage flowing into our rivers. We are attaching to this letter a petition signed by [number] greater Boston residents, calling for an end to sewage discharges. The number of petition supporters is only going to grow as more residents learn that unlike its counterparts in other cities, MWRA is unwilling to invest in a modern sewer system and instead prefers to use our rivers to dump sewage, a practice that went out of favor in the United States over a century ago. The fact that you would propose continuing dumping sewage into the Charles River for decades to come is shocking and deeply embarrassing.

Here are our key points to you, members of the MWRA Board:

- **The Charles River is Not a Sewer** MWRA is using the Charles River as sewer conveyance and treatment infrastructure due to inadequacies in the current sewer network and treatment system. This is illegal, disgusting and not befitting of modern, world class cities such as Boston and Cambridge, nor is it befitting of a trusted, well-respected water resources authority like MWRA.
- **The Charles River is Neither a “Lost Cause” nor a Dump** Throughout Boston’s development, many past leaders dismissed the Charles River as a “lost cause,” a water body so dirty it was not worth saving. Historically, each of these individuals was proven wrong as the Charles River has gone through multiple renaissances: from better management of solid and industrial waste to illicit connection consent degrees to the first Long Term Control Plan, and more recently better stormwater management requirements. Despite this lesson from the past, we unfortunately hear MWRA staff voicing the same sentiment today, that the Charles is so dirty, we may as well dump untreated sewage into the lower portion of the river - the implication being that this will only impact the Environmental Justice communities along the lower Charles, and not disturb the wealthier, upstream

communities. This argument also fails to acknowledge the difference between stormwater pollution and sewage pollution as well as the requirements already in place to address stormwater pollution via the Massachusetts Small Separated Sewer System permit.

- **Discounting Benefits** No initiative was taken to explore the use of green stormwater infrastructure and nature-based systems. We repeatedly heard MWRA discount these proven and cost-effective techniques. This is a serious failure, and a disservice to MWRA customers. To properly address CSOs, one must deal with stormwater, and to their credit the cities of Cambridge and Somerville have demonstrated a willingness to do so. As the Board of this trusted Authority it is incumbent on you to not be the reason our region cannot benefit from these types of innovative solutions, but rather to demand that MWRA staff take a comprehensive and modern approach to addressing the CSO problem in the most cost effective manner possible, including removing any barriers to pursuing green infrastructure solutions. Modern wastewater treatment agencies acknowledge and champion the multiple co-benefits achieved with such an approach, including improved adaptation to climate change by reducing flooding and heat impacts, in addition to reducing or eliminating CSOs. Not considering all solutions will result in projects that are more expensive and less effective and beneficial to the residents, visitors, and economy of the Commonwealth.
- **Lack of Consensus and Lack of Support** We strongly oppose the “preferred alternative” put forth for the Charles River. By our review, the scope of work set by EPA and MassDEP implies that the process to this point should have led to **consensus** on a preferred alternative. This is absolutely not the case. Alternatives were only made public within weeks of a “preferred alternative” being selected. By the time alternatives were made public there was no time left for the team to take feedback on the individual alternatives or take suggestions from the public on new alternatives, for example alternatives that could combine some elements of one alternative with elements of another.
- **Inadequate Level of Control** We strongly object to the selection of a “preferred alternative” at the lowest possible level of control from all the alternatives selected. This is not a serious suggestion and needs to be rejected immediately. This is not in line with MWRA’s mission statement to support environmental stewardship. The **highest** level of control should be selected as the “preferred alternative”.
- **Still Time to Get it Right** This updated Long Term Control Plan process has been a failure. The resulting recommendations are disrespectful to the residents of eastern Massachusetts. This is not the first time this has occurred. In the initial Long Term Control Plan process, the initial plan was eventually scrapped for a better and more cost effective option. The final, cost effective plan was the result of more engagement, more partnership, and an openness to be more creative. From MWRA’s website:

CSO Control Program Costs

In 1990, MWRA and its engineering consultants recommended a \$1.3 billion dollar CSO plan that called for an extensive system of pipes that would drop wet-weather flows into deep, bedrock tunnels where they would be stored temporarily until being pumped to Deer Island for treatment. In 1994, a second look at both CSOs and the entire sewer system brought a different solution. The [new plan](#), with a price tag of approximately \$906 million, is in keeping with new state and federal CSO policies and takes into account other MWRA facility improvements that also reduce CSO volumes and impacts. This plan recognizes that sewer system improvements have already reduced CSO volumes significantly and provided treatment for the majority of the remaining flows.

We would prefer to work collaboratively with you to develop a plan that reflects what the public wants, which is a clean, healthy, sewage-free Charles. But if that is not possible, then please be aware, we will fight this preferred alternative recommendation with every possible avenue we have available to us. We are confident we will achieve a significantly higher level of control for Boston's beloved Charles River in the end.

Sincerely,

A handwritten signature in cursive script that reads "Emily Norton". The signature is written in dark ink and is positioned above the printed name and title.

Emily Norton
Executive Director