WASTEWATER ADVISORY COMMITTEE TO THE MASSACHUSETTS WATER RESOURCES AUTHORITY

29 October 2026

Draft Updated CSO Control Plan Partners

Massachusetts Water Resources Authority, City of Somerville, City of Cambridge (Partners)
Attn: Draft Updated CSO Control Plan
2 Griffin Way
Chelsea, MA 02150

Submitted via the Portal: ***https://us.planengage.com/updatedcsocontrolplan/page/home***

Re: Comments on the Draft Updated CSO LCTP

The Wastewater Advisory Committee (WAC) to the Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to provide comments to the Partners on their Draft Updated Combined Sewer (CSO)[1] Long-Term Control Plan (LCTP) (the Draft Plan).

WAC is an all-volunteer committee formed to provide comment and direction to the MWRA Board of Directors on any issues related to wastewater, biosolids, and wastewater conveyance. WAC is also charged with educating the public about wastewater issues.

On this particular issue, WAC supports efforts to further reduce CSO discharges, while remaining conscious of other important water-related capital needs, and the need to spend public funds on several related priorities to achieve easily detected water quality improvements.

While this Plan further cuts the volume of future CSO discharges, it will not solve unrelated issues of flooding, sewer backups in separate municipal sewer systems due to flooding and leaks, or pollution—including bacterial pollution—now found in much of the region's stormwater. Stormwater pollution is the reason that this Plan as well as more extreme CSO discharge reduction will not increase the number of days the rivers will be safe for recreation.

[1] Combined sewer systems are designed to prevent sewer backups by discharging a combination of stormwater and sewage into water bodies when pipes become full of rain. To see how the systems work and what various changes would mean, visit the MWRA Advisory Board's explainer.

WAC supports the current Plan, for reasons outlined below.

Background

When MWRA undertook to clean up the Boston Harbor, and the Mystic, Neponset, Muddy and Charles rivers, it proposed and executed billions of dollars' worth of infrastructure projects—all of which worked. Residents experienced improvements in water clarity, smell, and an increase in fishable and swimmable days.

This updated CSO LCTP builds upon roughly 40 years of further infrastructure and water quality advances undertaken for the region by the MWRA and the communities that send combined sewage and stormwater to the Charles and Mystic river watersheds (so, starting from a cleaner baseline already).

The Draft Plan

The Draft Plan outlines four possible levels of CSO discharge reductions (or control). It recommends a level which eliminates combined sewage discharges in the watersheds in a 2050 Typical Year (TY)[2] and reduces them in more extreme storms for a projected cost of $1.3 billion.[3]

A less costly approach that would reduce but not eliminate CSO discharges in the Charles and Mystic rivers (est. cost $870 million) was discarded early in the drafting process in response to public concerns. In the Plan's appendices, the Partners outline two more aggressive options—topping out at roughly $6.6 billion.[4]

[2] A Typical Year is a rainfall scenario engineers use to predict a sewer system's performance in an average storm year. The 2050 TY includes more extreme rainstorms predicted in climate change models for this area.

[3] Including: 549 acres of sewer separation (or modernization) that includes green stormwater infrastructure (for instance planted areas that allow rainwater to slowly seep into the ground), and 25.5 million gallons (MG) of stormwater & sewage storage, mostly in large underground tanks.

[4] These comments are grounded in the Draft Plan's water quality data and modeling

The currently recommended plan has higher CSO control goals than other major combined systems—including New York City, Portland, OR, Paris, Tokyo and London.[5]

WAC believes the Partners deserve praise for opting for higher levels of CSO discharge reduction.

In particular, the Partners used a climate-forward 2050 TY rainfall model—which takes future climate change and predicted higher-intensity rainstorms into account. **This is the first of its kind in the United States**. Infrastructure designed to this standard will remain effective under conditions that would overwhelm systems designed using historic rainfall models.

In fact, the storms likely in 2050 would make the flooding the region saw in March 2010 look relatively manageable.[6] Unless significant capacity is added to municipal sewer pipes elsewhere in the watersheds, storms in 2050 and beyond will overwhelm most of the sanitary (separated) sewer systems in the region, sending sewage into basements, streets and the rivers no matter what improvements are made downstream in the combined systems.

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Partners' presentation; June 2, 2026 Public Meeting, slide 15

[6] "During the month of March of 2010, a new total of 14.83 inches of rainfall accumulation was officially recorded by the National Weather Service (NWS)... Torrential rain falls lasting ten days caused March 2010 to be the wettest month on record for the City of Boston.' Climate Change Vulnerability Assessment, City of Cambridge, 2015

WAC commends the Partners for adopting this conservative, climate-forward, vs. historic, modeling for this Draft Plan.

Importantly, all four options outlined in the Draft Plan include removal of all CSO in a Typical Year from Alewife Brook. WAC recognizes this investment will clearly result in water quality improvement along the brook. The committee toured the Alewife in 2024. All CSO discharges in the Alewife now are untreated, meaning raw sewage enters the brook with the stormwater. As it is a small water body, this current sewage contribution is particularly noticeable. WAC is pleased that all the Plan's options eliminate combined sewage discharges in a Typical Year to the brook.

MWRA and the Partners, instead of opprobrium, should be celebrated for

A. impressive progress to date controlling combined sewage overflows (e.g. reducing CSO discharges by 88% and disinfecting 93% of remaining CSO flow) and
B. designing the current draft plan to further aggressively address the issue of remaining CSO discharges.

Additional expenditure on CSO will not substantially improve water quality

The Partners have shown that these watersheds—and, in fact, the region—face three significant water challenges that will be compounded as climate change increases rainstorm intensity. None of these can be adequately addressed in a CSO plan:

- Flooding—both localized and riverine as a result of climate change
- Sanitary (separate) sewer overflows
- Stormwater pollution.[7]

In light of these non-CSO challenges, none of the four options outlined in the Draft Plan will have an effect on the water quality, smell, clarity, or number of days the rivers will be safe for recreation detectible by the general public. Despite investing significant ratepayer funds in large infrastructure projects, these outside pollution sources will still make recreation dangerous after significant storms.

[7] Separate stormwater pipes are carrying high levels of fecal pollution into these 3 water bodies- the Charles, Mystic, and Alewife, probably from aging sewer pipes.

In fact, the data in the plan show a diminishing return on investment as the size of the projects increases.[8]

Large investments of this sort should have proportional benefits. The public will otherwise feel that the MWRA and partners built gold-plated projects that don't work.

Fiscal and environmental trade-offs

WAC is concerned that the public is insufficiently informed about the Draft Plan. Long-term rate increases and community trade-offs have had some limited discussion, but WAC believes that as yet few residents understand them, particularly the negative impacts more aggressive options would have.[9]

For one, WAC is aware of how communities respond when utility bills rise sharply. Very often, they hold off on repairing their own aging sewer pipes, so residents don't face unaffordable bills.[10] But delaying these repairs means more sewage leaks into stormwater pipes—making river water quality worse.

It is fiscally and environmentally prudent for communities to continue to invest in repairing their own sewer pipes—to both reduce flows to Deer Island and to remove fecal contamination from stormwater and the rivers.

The second category of fiscal tradeoffs are at the MWRA level.

If the Authority is mandated—and this Plan would become a mandate, unlike other maintenance or expansion needs—to build extensive CSO storage on the Charles, Alewife and Mystic, its ability to borrow and to address critical maintenance and construction needs is likely to be affected.

For most of its history, WAC has stressed the importance of maintaining the infrastructure in which the region has already invested—particularly Deer Island and the system of

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[8] The Partners' data and modeling find that CSO discharges under all 4 alternatives for the Charles and the Mystic rivers would not meaningfully impact river water quality—because stormwater dominates fecal bacterial loading in both rivers.

[9] For a community-by-community estimate of costs for two of the options, download the CSO Long-Term Cost Dashboard.

[10] Already 18% of Cambridge ratepayers face "unaffordable" sewer bills as defined by federal guidelines (2% of median household income). Under the Draft Plan, this figure would increase to 24%; under the 25-year level of control 46%. *Figures via Cambridge DPW*.
Somerville, under the Plan, will see its average sewer bill increase 205% by 2055 for no water quality benefit. The higher costs are for larger tanks at the Somerville Marginal facility, where CSO is already disinfected.

large pipes and pumps that bring sewage to it. WAC would not want to see MWRA potentially squandering past public investments. WAC recalls that Deer Island is 36 years old, and many parts of the treatment plant need to be rehabilitated, renovated or replaced. Other areas in which MWRA has invested are also coming due for major maintenance.[11]

In addition, while WAC's focus is wastewater issues, we are aware of the MWRA's pending commitment to build a second drinking water tunnel to supply the Boston region. This $2.1 billion project, by ensuring uninterrupted access to drinking water, is critical for protecting both

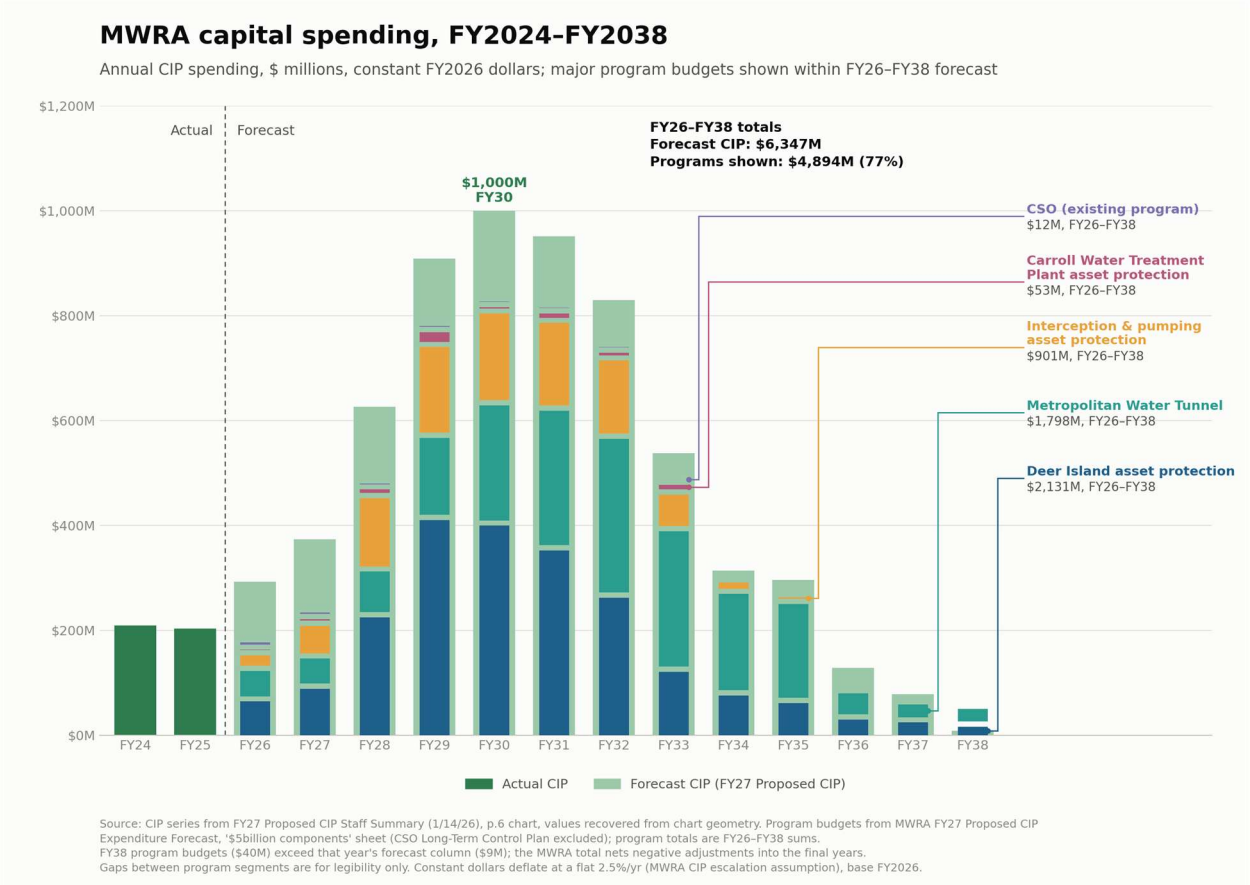
A. public health, including the continued operations of hospitals, and
B. against the risk of lost revenue to businesses to the tune of over $1 billion per day.

This project will raise the water bills of many of MWRA's customers at the same time as Deer Island repairs and the implementation of this Plan impact their sewer bills.

Further, the impact of the larger plans on Magazine Beach and the Esplanade temporarily and permanently have not been adequately illustrated and debated, along with other

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negative environmental impacts such added air pollution (e.g. from construction and maintenance vehicles).[12]

WAC's position

WAC recognizes the need to further reduce CSO discharges. However, for the reasons above, WAC would not recommend a more aggressive plan than the current Draft Plan, which is already more aggressive than the original proposal, increasing the cost from $870 million to $1.3 billion.

Unlike some commenters, WAC believes the continued control and management of CSO discharges into these three water bodies represents a regional and state benefit, and therefore regional contributions to it are appropriate.

However, WAC believes that the region should retain financial capacity for other investments with higher impacts on water quality.

In its major investments to date, MWRA built for the future our region can expect. WAC feels the Partners are continuing that tradition with this Draft Plan.

Again, thank you for your attention to our comments.

Yours,



Dan Winograd, Chair

Wastewater Advisory Committee to the MWRA

[12] The proposed Cottage Farm tank permanently removes some of Magazine Beach Park (serving a minority-designated Environmental Justice community). The minimum estimate for just the pump building is 40'x60'—about half the size of a basketball court—plus parking and fencing. The higher-control plans would remove an additional .332 acres from Magazine Beach—about 1/3 of a football field, as well as land for pump stations and shafts on the Esplanade.