Gwendolyn Speeth 16 Churchill Avenue Cambridge, MA 02140

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Claire Golden MassDEP, Surface Water Discharge Program 150 Presidential Way, Woburn, MA 01801 Submitted via email: massdep.npdes@mass.gov AND Michele Barden US Environmental Protection Agency – Region 1 5 Post Office Square, Suite 100 (06-4) Boston, MA 02109-3912 Submitted via email: barden.michele@epa.gov

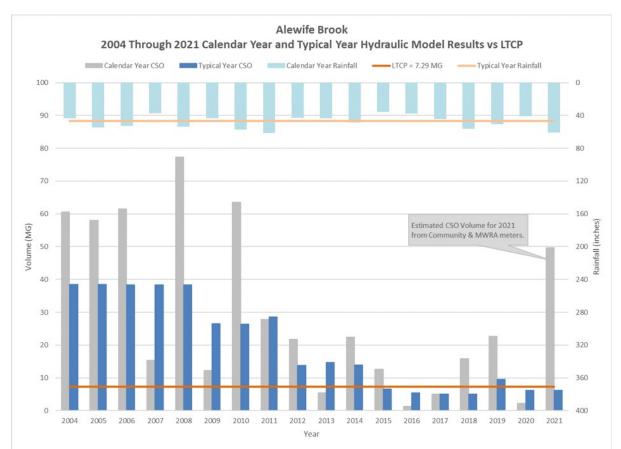
Re: MWRA Deer Island

Dear Ms. Golden and Ms. Barden,

My name is Gwen Speeth. I'm a concerned neighbor living downwind of the oxygen-deprived, stench-emitting Little River/Alewife Brook. I'm writing to implore you, please, to use your regulatory powers to protect me and my neighbors in the clogged overflowing brook's floodplain from the use of our waterbody, in our state park, as hydraulic relief for MWRA, Cambridge, and Somerville's inadequate sewer system. Please don't abandon this environmental justice community of 5,000 people by accepting the permittees' assertion that the work of the Boston Harbor Clean-up is complete, while tens of millions of gallons of combined sewage still flow into this narrow, 1.6-mile long, concrete-trapped brook.

A layperson, I've immersed myself in sewage and CSO regulations to try to understand the incomprehensible environmental outrage that allows untreated human and industrial waste to be released into the park near my home. I'm told that modelling discharge volumes and activation frequencies based on what *might* happen in a "typical" year is necessary for decision-making purposes, but seeing and **being repeatedly nauseated by the actual over 50 million gallons of combined sewage dumped into Alewife Brook in 2021** (and tens of millions of gallons again in 2023), it must be clear to citizen and expert alike that **more can and must be done to protect us from hazardous sewage flowing through our neighborhoods.** 

MWRA argues that ratepayers mustn't be burdened with the higher rates they say would result from decreasing or eliminating CSO discharges, but they refuse to implement a tiered-rate structure that could help pay for it. They insist that affordability be the highest criterion for alternatives analysis, while spending untold ratepayer dollars lobbying against citizen-led legislation to address CSOs, and paying consultants to write Astro-turf interventions, which they have pressured ratepayer communities to submit to you, rather than allowing the communities affected by CSOs to communicate the actual environmental concerns of their residents. Please see those cookie-cutter "public" comments for what they are, given the unavoidable perverse incentives that induce MWRA to assert that the continued dumping of millions of gallons of untreated sewage in our waterways is acceptable.



MWRA's own graph shows the exponential increase in CSO discharges into the Alewife Brook since the work of the last LTCP was completed in 2015. Permittee claims of 85% improvement are cold comfort for those of us who live or try to recreate within smelling distance of this metered-discharge reality.

When the brook was channelized by the state, there was a commitment to dredge it regularly. If MWRA insists that the sewer system they came into existence to build requires them to use the Alewife Brook for hydraulic relief, the least they can do (while they invest to increase capacity to meet current and future needs) is to maintain the channel into which they're dumping the sewage their system can't handle. Please follow through on Todd Borci's EPA comments on MWRA's Scope of Work for the new Long-Term Control Plan and compel MWRA to work with their partner state agencies MBTA, DOT, and DCR to dredge the Alewife Brook. Once-in-ageneration federal funds, combined with contributions from Cambridge and Somerville, must be directed at removing and disposing of the more than half a million cubic feet of sediment that catch debris and sewage, preventing the brook from flowing freely or storing the alarming increase in rainwater that regularly causes sewage-contaminated flooding. Removing this historical build-up of sediment is imperative as new sediment gathers, unable to flow downstream; each year's leaves and branches prevented from biodegrading and dispersing naturally, trapped in the concrete channel. The need to dredge the Alewife Brook is all the more urgent given the increased intensity of rain events and the massive burst in development in Cambridge just upstream of the Alewife CSOs. Tens of millions of gallons of NEW sewage will soon overwhelm the system further, with current Cambridge I/I requirements of developers inadequate to compensate for the imminent unprecedented increase in sewage.

Please look into the situation in and around the Alewife Brook and compel the permittees to meet the requirements of the Nine Minimum Controls for the brook in a meaningful way that will actually decrease, and ultimately eliminate, the dumping of tens of millions of gallons of combined sewage in my densely populated neighborhood. Please also compel the polluting permittees to create an on-site notification system to alerts commuters, parkgoers, neighbors, and abutters in real time when sewage is, or has been, discharged. A colored light system into which each permittee feeds the information from their CSOs would provide residents with the information they need it regardless of volume (Cambridge's current Public Health Department posted notifications are helpful, but inadequate, as they are only triggered if and when the activation persists beyond 2 hours, regardless of volume, when <u>volume is the most salient issue</u>). Beyond the horror of realizing this summer that our neighbors were jogging through sewage-laden floodwater; parents pushing their children through it in strollers and on bicycles, I was told by one enthusiastic nature lover as we passed each other just downstream of CSOs CAM401A and MWR003 after a discharge, that he had innocently been drinking the water as he walked along the brook.

As someone who has nightmares, literally, about raw, untreated sewage in the state park where I seek respite and recreation, I beg you to act. I've devoted a great deal of time and energy as a concerned citizen working to understand and communicate with others about this problem. To a person, they all have the same reaction of astonishment and disgust when they hear that the Clean Water Act is not protecting us from having sewage dumped into the brook in their park. We watch the number of species of birds and other animals plummet following discharges. You at EPA and MassDEP have the power to help us change this, or to leave us literally up the creek.

Please, help us.

Sincerely and gratefully, Gwen Speeth