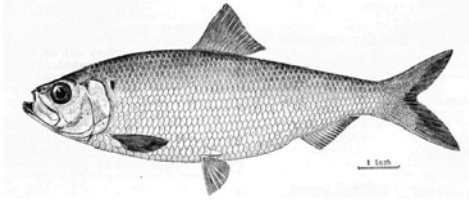


Save the Alewife Brook



Environmental Health is Community Health

November 28, 2023

Michele Barden
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Claire Golden
MassDEP
Surface Water Discharge Program
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Re: MWRA Deer Island – Draft NPDES Permit for the MWRA DITP
Public Comment on NPDES Permit No. MA0103284
Massachusetts Water Resources Authority (MWRA), Applicant

Dear Ms. Barden and Ms. Golden,

[Save the Alewife Brook](#) appreciates the opportunity to provide public comment on the NPDES draft permit for MWRA and Deer Island, especially as regards the discharge of untreated sewage and industrial waste into local waterways.

Save the Alewife Brook is a growing grassroots environmental group with supporters in the communities along Alewife Brook, including Somerville, Cambridge, Arlington, Belmont, and Medford. We formed our organization to raise awareness about the unsafe condition of the brook, and to advocate for an end to combined sewer discharges. We envision a Brook that is safe to live near, an environmentally healthy community resource -- not one that is hazardous because it is used as an overflow sewer. We are especially concerned about existing health impacts of sewage pollution on the Environmental Justice populations who live within the Alewife's 100-year floodplain.

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Untreated Alewife CSOs disproportionately impact our community.

100% of Combined Sewage Overflows into Alewife Brook are untreated. In 2021, 51 million gallons of untreated sewage pollution was discharged into Alewife Brook. Alewife Brook is a shallow, narrow, flood-prone waterbody, yet more untreated sewage is discharged into this waterbody than any other in the MWRA's system.

The Alewife basin is densely populated. There are an estimated 5,000 people living in the Alewife's 100-year floodplain. During major flood events, sewage-contaminated water from the Alewife Brook flows into the homes, yards, and parks of the area's most diverse and vulnerable neighborhoods, where there have been documented cases of residents becoming sick with digestive and flu-like disorders after forced exposure to Alewife flood water.

During a 2023 Alewife flood event, residents were exposed to 8 million gallons of untreated sewage pollution.

The Alewife CSO Permittees reported that over 8 million gallons of untreated sewage pollution was discharged from CSOs into Alewife Brook on August 8, 2023. The Alewife Brook overflowed its banks that day, sending untreated sewage pollution into the Alewife Greenway path. Our neighbors had no idea that they were walking, bicycling, and pushing baby strollers through untreated sewage. They just saw standing water in the park.



Neighbors jogging, walking, cycling, and pushing baby strollers through untreated sewage flood water on August 8, 2023. Photo by David Stoff.

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Residents should not have to walk through hazardous sewage pollution to get to work.

The Alewife Greenway is a popular transportation corridor that area residents use as an alternative to single-occupancy vehicle travel. It serves as a connection between Broadway at the Somerville/Arlington line and Massachusetts Avenue at the Cambridge/Arlington line, to the Alewife Red Line MBTA station and the Minuteman Bikeway. The Alewife Greenway Path is also used for recreation, including school sports. It is part of the state-owned Alewife Brook Reservation, built under the guidance of landscape architect Charles Eliot and historically preserved for the citizens of the Commonwealth. The Alewife Reservation should be protected and not used as an open overflow sewer by MWRA, Somerville, and Cambridge.

Exposure to Alewife sewage pollution is preventable with real-time, on-site notification.

Save the Alewife Brook believes that it is crucial for community-generated data to be included in the permitting decisions. After the August 8, 2023 storm, when people were observed pushing baby strollers through standing sewage, we documented the flood event, and notified the mainstream press. The event received news coverage on cable TV and public radio. Our efforts also included an email campaign to EPA, asking for an in-place and real-time notification system with colored lights along the Alewife Brook, similar to the system that the Potomac River has near EPA headquarters. Our petition generated over 400 responses requesting that EPA consider enhanced public notification measures in the permit. The high level of response was due to the desire for a solution and community knowledge that something is wrong here.

It is time to listen to community voices. Environmental Justice neighborhoods should not be treated like an open sewer.

In our comments on the CSO permittees Final Public Notification Plans, we recounted instances of incidental contact, similar to the August 2023 event. We identified available resources the permittees could use to identify land areas affected by the CSO discharges. This included a map originally created by MWRA that identified the exact area that flooded. We received no response.

The Alewife CSO Permittees must stop trivializing the impacts of their untreated sewage pollution on our community during flood events. The Alewife CSO Permittees should publish an accurate map alongside all required CSO notifications. That map should show the land areas affected by CSO discharges, the locations of the CSOs, future Climate Change flood impacts, and Environmental Justice neighborhoods that are impacted by untreated Alewife Brook sewage pollution flooding.

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Climate Change is expected to make Alewife sewage pollution much worse.

Cambridge's Climate Change consultant, Dr. Indrani Ghosh, has shown in her [Future Typical Year research](#) and planning that even 5% more annual precipitation in the Boston area will result in two to four times as much CSO discharge volume.

The current regulatory process is failing our community. The first Long Term Control Plan provided neither "[virtual elimination](#)" (p 33, 25-year level of CSO control) nor a CSO treatment facility for the Alewife. And after more than two decades, SOM001A is still out of compliance with the control plan. This is unacceptable, given the disproportionate impact on multiple Environmental Justice neighborhoods and the population density of the area. We demand an equitable solution to the problem.

MWRA must stop using Alewife Brook as an open sewer to compensate for the lack of adequate capacity in their system.

Rather than making necessary upgrades to their aging sewer system to increase conveyance and treatment, the MWRA is using the Alewife Brook as cheap hydraulic relief to provide capacity for their regional sewer system.

At the 02/17/2022 MWRA public briefing to discuss the Final CSO Performance Report, MWRA's consultant Don Walker from AECOM said, "*The MWRA system is limited by downstream capacity. Under very large storm events, the capacity of the Alewife Brook Pump Station, which is downstream of [MWR003] is reaching capacity – a very large facility, it has 90 MGD capacity. That then discharges into sewers that are conveying flow further downstream and going to the Chelsea Creek Headworks that then reaches capacity. And there are events when the capacity of our Deer Island treatment plant, 1.2 / 1.3 billion gallons per day is reached. So there are limits to what the MWRA can push through the system.*"

MWRA must present a bold solution to increase the capacity of its regional sewer system. A second local wastewater treatment plant should be in planning now to handle the existing flow during today's storm events, as well as future storm events.

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The Alewife sewage pollution problem requires a State and Federal solution.

The sewage pollution in Alewife Brook is exacerbated by the fact that the Alewife Brook serves as a natural border between multiple municipalities. The land itself is state parkland, managed by the historically under-resourced Massachusetts Department of Conservation and Recreation. The problem's being neglected for over a hundred years means that it is now more costly to address.

We ask the Environmental Protection Agency and the Massachusetts Department of Environmental Protection to regulate the Alewife Brook CSOs to the greatest extent possible to allow for a fair, equitable, and safe solution to the Alewife Brook sewage flooding problem.

We are aware of comment letters being filed by the Town of Arlington, David Stoff, and Stephen Perkins and applaud their efforts.

Sincerely,

Kristin Anderson, David White, David Stoff, and Gwendolyn Speeth

[Save the Alewife Brook](http://www.SaveTheAlewifeBrook.org)

cc:

Senator Elizabeth Warren
Senator Edward Markey
Congresswoman Katherine Clark
Governor Maura Healey
State Senator Patricia Jehlen
State Senator Cindy Friedman
State Representative Dave Rogers
State Representative Christine Barber
State Representative Sean Garballey
State Representative Adrian Madaro