



Making Waves Since 1986

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November 28, 2023

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

Claire Golden
Massachusetts Department of Environmental Protection, Surface Water Discharge Program
150 Presidential Way, Woburn, MA 01801

Submitted via email: MassDEP.npdes@mass.gov

Dear Ms. Barden/Ms. Golden:

Thank you for the opportunity to provide comments to the US EPA Region 1's draft National Pollutant Discharge Elimination System (NPDES) permit issued to the Massachusetts Water Resources Authority (MWRA) Deer Island Treatment Plant and CSOs (MA0103284), and to the Massachusetts Department of Environmental Protection (MassDEP). Thank you especially for previously extending the public comment deadline to allow for thoughtful feedback from community and organizational stakeholders.

Save the Harbor/Save the Bay has "been there from the beginning" advocating for the Boston Harbor Cleanup, construction of the Deer Island Treatment Plant and the transformation of Boston Harbor from a national disgrace into a source of recreational, educational and economic opportunity and civic pride. We take our name from the fact that not only would this effort eliminate the over 300 million gallons of sewage a day running into Boston Harbor, but would do so without sacrificing the health of Massachusetts Bay. After over 20 years of operation, testing and monitoring, the MWRA's operation of Deer Island is an unqualified success, with Boston boasting the nation's cleanest urban beaches as a result.

We write today to **strenuously advocate for the continued inclusion of the Outfall Science Advisory Monitoring Panel (OMSAP)** in the current permit renewal.

While little concern remains about the outfall's impact on water quality and environmental health of Boston Harbor and Massachusetts Bay, we strongly encourage the retention of the OMSAP as a body for responding to emerging and future issues and questions that will continue to arise, including climate resiliency and contaminants of emerging concern.

OMSAP is a volunteer group of scientists and experts in their fields who have dedicated the last 23 years to peer-reviewing the ambient monitoring plan, and using science-based methods for reviewing reports and addressing questions and concerns. It would be short-sighted to not include this group in the renewal and keep an established, effective system in place at little to no cost. If in-kind costs and EPA staff support of the OMSAP is the primary barrier to continuing this system, Save the Harbor is willing to

work with the agency to identify funds or alternative base for the OMSAP, if we can rely on their continued authority and the existing communication and reporting structure.

As Chair of the Public Interest Advisory Committee (PIAC), Save the Harbor is of course supportive of retaining the Committee as a part of the permit. Also volunteers, the PIAC helps ensure transparency of OMSAP, EPA and MWRA's work and reporting, alleviating concerns about and opportunity for misinformation.

In the end, Save the Harbor, like all of those involved with this process and the Boston Harbor Cleanup, will continue to strenuously advocate for swimmable waters, better fisheries, and the cleanest urban beaches in the country. In that pursuit, we need to make sure there is science-based decision making, and that it be flexible and transparent, and we believe that local scientists are best situated to do that. We have that in the OMSAP, which can respond quickly and provide information, and is not at risk of becoming more or less empowered under various administrations.

We strongly encourage EPA to retain the OMSAP in the renewal permit. Thank you for all your time and dedication to clean water and healthy fisheries in Boston Harbor and Massachusetts Bay and for your attention to our recommendation.

Sincerely,

A handwritten signature in cursive script that reads "Chris Mancini".

Chris Mancini
Executive Director
Save the Harbor/Save the Bay