CHARLES RIVER conservancy

43 Thorndike Street, S3-3
Cambridge Massachusetts
0 2 1 4 1

617 608 1410 t

crc@thecharles.org
www.thecharles.org

Board of Directors

Laura Jasinski
Executive Director
Craig Bida
Rob Dickey
Nathan Gauthier
Rohan Kundargi
Bonnie McLellan
Simeen Mohsen
Jake O'Neill
Alison Poor
Carolyn Thayer Ross
Laurel Schwab
Gautam Sundaram, *Chair*
A. Krista Sykes
David Valecillos

Board of Advisors

Renata von Tscharner
Founder
Ronald Axelrod
Jeffrey Bilezikian
Dennis Carlone
Philip W. Crutchfield
John DeVillars
Catherine Donaher
Hon. Michael S. Dukakis
Michael Epstein
Paul Fremont-Smith Jr.
Jennifer Gilbert
John Isaacson
Mark Kraczkiewicz
Daniel Langenthal
Edward G. LeFlore
Linda Lerner
Ania Masinter
Harry Mattison
Geraldine Pangaro
Randy Peeler
Matthew Petrie
Amy Segal
John Shields
Ann Tikkanen
Paul Walker
Hon. Michelle Wu

Executive Director Jonathan Gulliver
Massachusetts Water Resources Authority (MWRA)
2 Griffin Way
Chelsea, MA 02150

Re: Draft Updated Combined Sewer Overflow (CSO) Control Plan (Draft Plan) for the Alewife Brook, Upper Mystic River, and Charles River

October 29, 2026

Dear Draft Updated CSO Control Plan Partners,

The Charles River Conservancy (CRC) opposes the recommendations presented in the Draft Updated Combined Sewer Overflow Control Plan and respectfully urges MWRA, Cambridge, and Somerville to embrace the strongest level of control evaluated: **zero CSO discharges in a 2050 25-year, 24-hour design storm.**

Founded in 2000, CRC is a nonprofit whose mission is to make the Lower Charles River and its parks more vibrant, healthy, and welcoming. In partnership with the Massachusetts Department of Conservation and Recreation (DCR), Massachusetts Department of Transportation (MassDOT), and other stakeholders, we steward and activate 10 miles of riverfront in Boston, Cambridge, and Watertown. This vital network of open space is within walking distance of more than 300,000 urban residents and visited by 1 million+ people.

Although the Draft Plan represents progress, it is ultimately a half-measure. Its proposed 2050 Typical Year standard would spend substantial ratepayer dollars while permitting sewage discharges for generations. **Raw sewage does not belong in our rivers.** CRC stands with the Charles River Watershed Association, Mystic River Watershed Association, Save the Alewife Brook, regional environmental partners, and thousands of constituents and ratepayers in calling for the strongest level of control. CRC has consistently advocated for ambitious, achievable infrastructure that advances clean water, public health, quality of life, and climate resilience.

The Boston, Cambridge, and Somerville City Councils have each challenged the ambition levels of the Draft Plan and called for substantially stronger controls. There's also a demonstrated and serious need for broader state, regional, and/or federal funding to ensure the success of this once-in-a-generation investment.

The Charles River is an iconic public resource well worth protecting. Families gather along its banks, rowers and paddlers cross its waters, and the Head of the Charles Regatta draws tourists from around the world. The CRC's signature annual public swim City Splash provides the refreshing summer joy of swimming in the Charles River in the heart of the city. Playing, working, and exploring all happen in and around the river and its parks year round. These experiences show what a cleaner river makes possible: connection, recreation, and lasting memories. And yet, a sewage discharge can quickly replace that promise with human health risks and environmental damage.

This is the time to think big, aim higher, and invest for the long term. Climate change is bringing more intense storms. A plan calibrated to an estimated average year in 2050 is not resilient enough for the conditions the region will face. Lesser alternatives risk becoming temporary fixes whose benefits are quickly overtaken by heavy rains, thereby bearing another costly infrastructure cycle.

The Draft Plan's alternatives demonstrate that stronger control is possible. The difference between the selected plan and advocates' preferred alternative has been estimated at approximately $8.25 per household per month—a meaningful cost towards clean water infrastructure, but one as an investment in Massachusetts: in public health, climate resilience, tourism, recreation, jobs, quality of life, and the competitiveness of the region. **Ratepayers deserve an investment designed to solve the problem.**

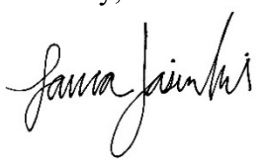
We recognize the scale and complexity of this challenge. CRC remains committed to constructive collaboration and supports examining hybrid solutions—including sewer separation and green infrastructure—to achieve the highest level of control. Stormwater pollution is also a known issue, but it cannot justify continued CSO discharges. Both challenges demand modern solutions.

Executive Director Gulliver, your appointment offers an opportunity for renewed leadership. We respectfully ask you to build upon MWRA's extraordinary legacy by championing a final plan equal to this moment. Bring municipalities, regulators, advocates, ratepayers, and environmental partners together around a lasting, innovative solution that protects the Charles River, Mystic River, the Alewife Brook, and the communities they serve.

For decades, the Commonwealth and MWRA ratepayers have invested in the Boston Harbor cleanup. The aftermath demonstrated that ambitious public infrastructure can transform a polluted waterway into a world-class destination, generating significant environmental, social, and economic returns. CSO control is the final chapter of that cleanup. We have come too far and achieved too much to accept an incomplete and disappointing ending. We request that your Final Updated CSO Control Plan presents a solution that achieves zero CSO discharges in a 2050 25-year, 24-hour design storm.

Let us aim higher, dream bigger, and finish the job.

Sincerely,



Laura Jasinski
Executive Director, Charles River Conservancy
ljasinski@thecharles.org