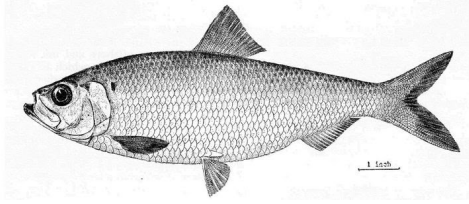


Save the Alewife Brook



Environmental Health is Community Health

April 22, 2024

Emailed to: massdep.publiccommentnpdes@mass.gov

MassDEP

Attention: Cathy Coniaris

100 Cambridge Street, Suite 900

Boston, MA 02114

Re: Comments on Tentative Determination to Adopt a Variance for Combined Sewer Overflow Discharges to Alewife Brook/Upper Mystic River Basin

Dear MassDEP:

These are the comments of Save the Alewife Brook on the MassDEP Tentative Determination to Adopt a Variance for Combined Sewer Overflow Discharges to Alewife Brook/Upper Mystic River Basin. Our comments concern the proposed variance of water quality standards for Alewife Brook. That variance would allow the cities of Cambridge and Somerville and the Massachusetts Water Resources Authority (MWRA) to continue to dump untreated human and industrial waste sewage pollution into Alewife Brook for an additional five years from six Combined Sewer Overflows (CSOs): CAM001, CAM002, CAM401A, CAM401B, SOM001A, and MWR003.

Alewife Brook is a Regional Recreational and Environmental Resource Being Degraded by CSOs.

Alewife Brook is a shallow and narrow stream of about 1 ½ miles in length that separates the town of Arlington on its west from the cities of Cambridge and Somerville on its east. It flows from its tributary, the Little River, at the MBTA Alewife Station, and empties into the Mystic River. It is part of the Department of Conservation and Recreation (DCR) Alewife Brook Reservation, a public park.¹

¹ This sprawling urban forest is filled with wetlands and a variety of birds. Walk along limited trails to see a rare side of nature without leaving the city. <https://www.mass.gov/locations/alewife-brook-reservation>. Accessed 4/17/24.

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In 2021, the MWRA and the cities of Cambridge and Somerville dumped a total of 50.74 million gallons of untreated sewage pollution into Alewife Brook from their CSOs.² In 2023, those same entities dumped more than 25 million gallons of untreated sewage pollution into Alewife Brook from their CSOs.³ Those pollution totals are significantly more than the allowable amount in a typical year.⁴

During rainstorms when CSOs are dumping untreated sewage pollution into Alewife Brook, the brook overflows its bank into Arlington, covering parts of the Alewife Brook Reservation with untreated human and industrial sewage wastes from CSOs. We saw that flooding five times in 2023.⁵ Many people use the Greenway path in the Reservation to get to and from the Alewife MBTA Station and for recreation. When Alewife Brook has flooded, people have pushed babies in strollers⁶ and biked through contaminated waters⁷ on the Greenway with no knowledge of the contamination because there is no onsite notification that a rainstorm has caused CSO contaminated waters to flood onto the Reservation. Especially troubling, in very large storms CSO sewage contaminated waters from Alewife Brook have flooded into the yards and homes of people who live near the Brook. Flooding of the Greenway and into residential areas creates public health dangers.⁸ Climate Change threatens to exacerbate the flooding problem, with wetter rain seasons, more frequent and more severe storms, and sea level rise.

A review of FEMA flood maps reveals an estimated 1,200 east Arlington residents, 3,500 Cambridge residents, and 300 Belmont residents live in the Little River – Alewife Brook 100-year flood plain,⁹ including many in Environmental Justice neighborhoods.¹⁰ They may all be subjected to CSO contaminated floodwaters. In addition, the Alewife Reservation is their local park as well as a necessary path to public transportation. CSO contaminated floodwaters hamper that use.

² MWRA annual CSO report for 2021, dated April 29, 2022.

³ [RPods - Mystic River Watershed CSOs 2023](#). Accessed 4/17/24.

⁴ Exhibit B to Second Stipulation of the United States and the Massachusetts Water Resources Authority on Responsibility and Legal Liability for Combined Sewer Overflows, as amended by the Federal District Court on May 7, 2008 (the “Second CSO Stipulation”). The Long Term Control Plan permitted annual total for Alewife Brook is 7.29 MG. That represents an annual average limit because there will always be variations from year to year. Significantly, for the past nine years, the average annual discharges have been more than twice the permitted level – showing the impacts of climate change and the inadequate capacity of the sewer system to handle flows and highlighting the disutility of relying on typical year modeling as a substitute for real conditions.

⁵ No entity is required to monitor, document, and report flooding of the brook. It is seen and experienced by those who live near Alewife Brook and by those who use the DCR park.

⁶ https://youtu.be/FQL_M5UWSKs?si=5r0EXRN0azUdK5bl

⁷ <https://youtu.be/U7eueqNOuSo?si=WxYk1c6y8iOSP-WR>

⁸ Public health officials recommend avoiding contact with active CSO receiving waters during rainstorms and for 48 hours afterwards as there may be increased risks due to bacteria and pollutants associated with urban stormwater runoff and CSOs. <https://www.mwra.com/03sewer/html/sewco.htm>. Accessed 4/17/24.

⁹ <https://www.mapsonline.net/arlingtonma/index.html> (click on FEMA Flood Hazard Layers tab). Accessed 4/18/24.

¹⁰ Summary Fact Sheet for the tentative Variance at 2.

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Save the Alewife Brook Seeks to Improve the Condition of Alewife Brook.

Save the Alewife Brook is a growing grassroots environmental group with supporters in Arlington, Belmont, Cambridge, Medford, and Somerville. We work to address flooding and water quality problems in Alewife Brook. We are especially concerned with the CSOs that dump untreated sewage into Alewife Brook because they degrade the brook environment, harm the public health, curtail recreational uses of the brook and the Alewife Brook Reservation, and impede an important walking and biking pathway to public transit.

Criteria for Granting the Variance Have Not Been Met.

We think it is important to note that granting a variance is at the discretion of MassDEP. It is not mandatory even if the applicant meets a criterion for allowing a variance to be granted. 314 CMR 4.03(4) ("The Department may ... grant a variance...." The use of the word, "may," rather than "shall," provides discretion to MassDEP.).

MassDEP proposes to grant this variance based on its determination that implementation of more stringent CSO controls to meet the underlying designated use and criteria at this time would result in substantial and widespread social and economic impact as specified in 314 CMR 4.03(4)(a)(6) and 40 CFR 131.10(g)(6). That determination appears to be based on an August 8, 2023, letter from MWRA that does little more than offer an inflation adjustment to an 18-year-old analysis for complete elimination of CSOs through sewer separation throughout the entire MWRA sewer service area. It is inadequate to support a determination of widespread social and economic harm for these reasons:

- Some CSOs now discharge into waters that have been designated B-CSO, where such discharges are permitted and no longer required to be eliminated. The data should be reconfigured to eliminate the costs related to those CSOs.
- Complete sewer separation is not the only method to achieve CSO elimination. Use of green infrastructure and storage are two other options. Green infrastructure has co-benefits that would offset some of the costs. MWRA uses storage at the South Boston beaches for five CSOs. Milwaukee is an example where storage can be more cost effective than sewer separation to reduce and eliminate CSOs.¹¹
- The current variance assigns requirements and responsibilities for CSO discharges separately to the owners of the CSOs in the variance waters. Thus, MassDEP should have required separate findings from MWRA, Cambridge, and Somerville for each of the variance waters. Those three entities have different means of raising funds and distributing costs.
- The financial capability analysis performed by MassDEP aggregates the census-based household data at the municipality level in determining the impact to households – but Cambridge and Somerville have the flexibility to set different sewer rates that could cap

¹¹ <https://www.bloomberg.com/news/articles/2019-12-05/how-milwaukee-built-a-superlative-sewer-system>. Accessed 4/19/24.

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rates or provide subsidies for low-income households that might not be able to afford higher rates. MWRA also has options it has chosen not to implement. Requiring an analysis at the local level is required by 314 CMR 4.03(4)(a)6., which indicates that the financial analysis be for “the affected area,” which is Cambridge and Somerville for the proposed Variance for Alewife Brook.

- The financial capability analysis does not take into consideration federal funds that are available under the Inflation Reduction Act and other programs that could be used.
- It is likely that costs included in MWRA’s letter are for actions it will need to undertake due to the increased storm flows caused by climate change. For example, MWRA cannot continue to have Sanitary Sewer Overflows, which will get worse with climate change and will require system capacity improvements by MWRA. Those costs should be broken out from the total and not considered for CSO elimination.

Consequently, the CSO entities have not met their burden of demonstrating that “Controls more stringent than those required by sections 301(b) and 306 of the Federal Act for the Alewife Brook would result in widespread social and economic harm,” 314 CMR 4.03(4)(a)6. It would therefore be inappropriate to grant another variance of water quality standards for Alewife Brook based on the information provided by MWRA in its August 8, 2023, letter.

In addition, the CSO entities should not be awarded a new variance if they have failed to meet the requirements of the current variance. SOM001A has failed to meet discharge and floatable controls requirements. There must be some consequence for that. CAM401A continues to fail to conform to the hydraulic models. MWRA fails to adequately maintain its sewers to prevent odors. Further, granting the variance would undermine environmental justice principles, which call for enforcement of environmental standards and protection of environmental neighborhoods from environmental harms.

The Conditions Set Forth in the Proposed Variance Are Inadequate.

If MassDEP nonetheless will grant the variance to water quality standards for Alewife Brook, we urge these conditions be included in the variance:

1. At the meeting of the CSO entities (Cambridge, Somerville, and MWRA), watershed advocacy groups (Charles River Watershed Association, Mystic River Watershed Association, and Save the Alewife Brook), and representatives of MassDEP, the CSO entities stated that there would be no improvements in CSOs until after there is a new CSO Long Term Control Plan (LTCP) in place and implemented. In effect, they said the status quo would remain in effect for the next few years. Our position is that MassDEP must add conditions to the Variance so that CSO discharges do not get worse -- and to require improvements for CSOs while waiting for the new LTCP to be approved and implemented.

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The most obvious and necessary conditions to add to the variance are: 1) a prohibition on new hook ups to the combined sewers in Cambridge and Somerville that contribute to the CSOs in Alewife Brook; and 2) a prohibition on more than de minimis increases to current flows to those combined sewers. Those prohibitions would help limit increases in CSO activations and sewage pollution discharge amounts into Alewife Brook during the term of the variance (other than those caused by increasing storms and storm intensities due to climate change).¹² Those prohibitions would not result in “widespread social and economic harm” and instead would help ameliorate conditions in Alewife Brook. They will help ensure “that highest attainable interim effluent conditions can be achieved and maintained during the Variance period.”¹³ The prohibitions are necessary to meet the federal standard for a water quality variance: that the requirements of the variance shall represent the highest attainable condition of the water body applicable during the variance. 40 CFR 131.14.

2. The Regional Inflow and Infiltration Abatement Plan set forth in the Tentative Variance, Exhibit A section 2, should require MWRA to determine the current amount of I/I contributing to the CSOs at Alewife Brook for various storms, to identify how much I/I reduction it will achieve during the term of the variance, and to file annual reports on how the plan is being implemented and the outcomes, including I/I reductions, achieved. This is especially important in an era of climate change.¹⁴
3. Because there will be very little or no improvement in CSO sewage dumping to Alewife Brook during the course of the variance -- and it may even get worse -- people using the Greenway path in the Alewife Brook Reservation and abutters of the brook require timely and clear warnings when CSOs are discharging into the brook and for at least 48 hours after a discharge has ended (e.g., red light when discharging and for 24 hours after discharge ends, yellow light for 24-48 hours after discharge ends, and green light if no discharges for more than 48 hours).¹⁵ Subscriber-based notifications are insufficient for those who may be using the Greenway. MWRA, Cambridge, and Somerville must be required to install warning beacons or similar highly visible signage when CSOs on the Alewife Brook are discharging, and they must be required to work together to agree on a common notification approach. Those beacons should be on the Greenway path closest to each CSO and on the Greenway where flooding often occurs. We urge MassDEP to coordinate with the DCR to expedite any required approvals.

¹² In making this determination, MassDEP is required to take climate change into account. “In considering and issuing permits, licenses and other administrative approvals and decisions, the respective agency, department, board, commission or authority shall also consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise.” MGL c. 30, sec 61. Climate change threatens to make the CSOs much worse.

¹³ See, tentative variance, condition E.

¹⁴ See footnote 12.

¹⁵ See footnote 8.

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4. The tentative variance requires that certain reports and plans be provided to MassDEP and EPA during the variance. The variance should require that the advocacy groups be copied on those reports and plans so they have them when they are filed with MassDEP and EPA. Those reports include, but should not be limited to: Receiving Water Quality Monitoring sampling reports (variance condition B); CSO Performance Evaluation supplemental report (variance condition C.1); Annual CSO Discharge Report (variance condition C.2); A Draft Updated CSO Control Plan including a Recommended Plan (variance condition F.5); A Final Updated CSO Control Plan, which addresses comments received on the Draft Updated CSO Control Plan (variance condition F.6); any affordability analysis consistent with EPA's 2023 Clean Water Act Financial Capability Assessment Guidance, along with any other relevant information to assess financial capacity (variance condition F.4); Regional Inflow and Infiltration Abatement Plan (variance Exhibit A, section 2); and Summary of Metering Data for CSO and SSO events (variance Exhibits A, B, and C, section 1).
5. The variance should require that the project, "perform further system metering and hydraulic model calibration to improve CAM401A system understanding and address differences in current hydraulic models," (variance Exhibit A, section 3, and Exhibit B, section 2.) be completed within one year and require a report from MWRA and Cambridge within one month after that. It makes no sense to us that MWRA and Cambridge have the duration of the variance to complete the project. Completing the project sooner may provide new information to help them reduce discharges from CAM401A during the variance and help inform their next LTCP.
6. The variance must require MWRA to create and implement an odor control program for its assets along Alewife Brook within six months and to file a copy of that program a month after that, with annual reports thereafter. Odors coming from the sewer system are a constant source of complaints for those using the Greenway. In July 2022, after a discussion with a member of Save the Alewife Brook, MWRA sealed openings on a MWRA siphon structure on the Alewife Brook Reservation. The terrible odor emanating from that structure was gone. Yet, this spring, MWRA performed some work in the area, the seal was removed, and the horrible odor is back. This is a failure to implement one of the nine minimum controls – proper maintenance of a sewer system.

Other Portions of the Tentative Variance Need Amendment¹⁶

1. Section A of the Variance, Level of Required CSO Control During Variance, should make it clear that the CSO discharge limits in Exhibit D shall remain in effect during the term of the variance, regardless of whether the Court determines the original case to be closed during the variance period.

¹⁶ We are grateful to the Mystic River Watershed Association for identifying some of these issues and for assisting Save the Alewife Brook in our review of the tentative Variance.

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The enforceability of this condition is seriously compromised by the phrase, "...allowance for any conditions that exceed Typical Year conditions." How will MassDEP determine whether or when the Typical Year conditions have been exceeded? Would it be rainfall greater than an annual total of 46.8 inches? Or by more than 93 storms? MassDEP needs to clarify how this allowance will be determined in the Final Determination. In doing so, MassDEP cannot rely on the Typical Year that has been used by the CSO entities. It is over forty years old, based on past rainfall data, and does not reflect recent conditions, much less future ones. MassDEP instead must take climate change into account. "In considering and issuing permits, licenses and other administrative approvals and decisions, the respective agency, department, board, commission or authority shall also consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise." MGL c. 30, sec 61.

2. A five-year variance is too long in this instance. The development of the draft updated CSO plans and the reviews and approvals by MassDEP, EPA, and MEPA should be completed by the middle of 2027 according to Section F.6 of the tentative Variance. That would leave sufficient time for MassDEP to issue another variance incorporating the approved implementation milestones by the end of 2027. MWRA's letter reflects the same timing: "At a minimum, 8 months should be added beyond the new submission date for the Final Updated CSO Control Plans, bringing the variance to at least August 2027." With that timeframe, we do not understand why Section F of the tentative Variance notes that it will take Mass DEP and EPA from January 2027 to August 2029 to decide whether to approve the new LTCP. Thus, it appears that a three-year variance would be more appropriate.
3. Section F. The schedule approved by MassDEP on July 22, 2022, has been superseded. The first sentence needs to be revised to reflect the new schedule contained in the September 2022 letters from MWRA, Cambridge, and Somerville and concurred by MassDEP and EPA in May 2023.
4. Section F.2. There is no reason or rationale provided for removing the language regarding green infrastructure that is included in the current variance at F.2. The following sentence should be included: "For the Cities of Cambridge and Somerville, use of Green Infrastructure technologies shall be considered."
5. Section F.3. The first sentence should be revised to replace the minimum requirements language with text that reflects the public meetings and hearings included in the Gantt chart submitted by MWRA, Cambridge and Somerville in the request to extend the schedule. Part of the rationale for the extension was to be able to provide robust public participation. We appreciate the meetings that have been held to date.

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6. The Fact Sheet for the tentative Variance references a requirement for "...active public engagement from Environmental Justice communities." (p. 12, 1st bullet). There is no such language in the tentative variance. It should be included.
7. Section F.4. We appreciate the explicit requirement that the affordability analysis be consistent with EPA's 2023 guidance. As we noted earlier in this comment, MWRA, Cambridge and Somerville should each be required to conduct and submit affordability analyses for Alewife Brook for their CSOs. MWRA's cost should no longer be limited to a "system wide elimination" threshold, but rather include only the costs associated with eliminating discharges at the CSOs in the variance waters, with Alewife Brook costs shown separately, and should consider not only complete sewer separation but also storage and green infrastructure options.
8. Section F.6. MWRA's September 2022 request to extend the schedule contains a December 31, 2026, deadline for submitting the Final Updated CSO control plan, not January 31, 2027. The same request envisioned that MEPA review would occur during 2026, concurrent with, or overlapping with reviews of the Draft Plans by MassDEP and EPA. The schedule for MEPA filings needs to include time for pre-filing outreach for Environmental Justice, as required by MEPA. MEPA filing should not be a final plan but a draft plan with alternatives after review by MassDEP and EPA.
9. The tentative Variance states that the CSOs listed in Exhibit D may discharge under the variance but Exhibit D is silent on whether there can be permitted discharges from the CSOs listed as closed or to be closed. For Alewife Brook, it would be best to list in Exhibit D only the six CSOs that currently discharge to Alewife Brook: CAM001, CAM002, CAM401A, CAM401B, SOM001A, and MWR003, and to remove the other CSOs from the list. If, for some reason, MassDEP wishes to list the closed and to be closed CSOs, then Exhibit D should specifically indicate that the six CSOs (CAM001, CAM002, CAM401A, CAM401B, SOM001A, and MWR003) are the only ones authorized to discharge into Alewife Brook.
10. Cambridge, Somerville, and MWRA should be required to have sewer maps online that show the combined sewers and the sewers that contribute to the Alewife Brook CSOs. We, and others who are interested in this issue, need access to those maps to participate fully in the process and to review the upcoming proposed LTCP. The public should not be required to file public records requests, with the inconvenience, additional time, and expense, to have access to important information it needs for its meaningful involvement throughout the LTCP review.

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Environmental Justice Must Be an Integral Consideration.

As mentioned earlier in these comments, Alewife Brook is adjacent to many environmental justice neighborhoods as defined by Massachusetts law.¹⁷ The Alewife Brook Reservation is their local state park. A clean Alewife Brook, not contaminated with sewage overflows, would enhance their enjoyment of the park and provide more recreational opportunities.

The Environmental Justice Strategy (EJ Strategy) of the Executive Office of Energy and Environmental Affairs (EEA) (issued February 2024) notes:

It is the policy of EEA that environmental justice and equity principles will be an integral consideration, to the extent applicable and allowable by law, in the implementation of all EEA programs, including but not limited to, the grant of financial resources or technical assistance, the promulgation, implementation and enforcement of laws, regulations, and policies, the provision of access to both active and passive open space, and the diversification of energy sources, including energy efficiency and renewable energy generation. Further, any agency, department, division, board, and office within EEA that is making any policy, determination, or taking any other action related to a project that is subject to review under the Massachusetts Environmental Policies Act ("MEPA"), must consider "environmental justice principles," as defined in M.G.L. c. 30 section 62.¹⁸

Environmental justice is based on the principle that all people have a right to be protected from environmental hazards and to live in and enjoy a clean and healthful environment regardless of race, color, national origin, income, or English language proficiency. Environmental justice is the equal protection and meaningful involvement of all people and communities with respect to the development, implementation, and enforcement of energy, climate change, and environmental laws, regulations, and policies and the equitable distribution of energy and environmental benefits and burdens.

MassDEP's EJ Strategy, as set forth in the EEA EJ Strategy, includes "Identifying permitting or other applicable regulatory authority over development projects, brownfield remediation, industrial operations, and commercial facilities, which may impact EJ populations and mechanisms to ensure that EJ populations are protected." EJ Strategy at 92.

¹⁷ Summary Fact Sheet for the tentative Variance at 2.

¹⁸ ... principles that support protection from environmental pollution and the ability to live in and enjoy a clean and healthy environment, regardless of race, color, income, class, handicap, gender identity, sexual orientation, national origin, ethnicity or ancestry, religious belief or English language proficiency, which includes: (i) the meaningful involvement of all people with respect to the development, implementation and enforcement of environmental laws, regulations and policies, including climate change policies; and (ii) the equitable distribution of energy and environmental benefits and environmental burdens.

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In this matter, MassDEP appropriately offered interpretation services at the three public hearings on the tentative Variance and held a very well attended third public hearing at the request of advocacy groups. We appreciate that. The tentative Variance and the accompanying fact sheets mention outreach to Environmental Justice groups and neighborhoods, but the links from there go to websites of Cambridge, Somerville, and MWRA that mention the need to be involved but do not show any other level of outreach to Environmental Justice groups and neighborhoods. Simply having a notice on a CSO website is not outreach to Environmental Justice groups and neighborhoods.¹⁹

The tentative Variance does not indicate how MassDEP took environmental justice into consideration in determining whether to issue the variance, the conditions it would require in the variance, and mitigation measures for continued pollution dumping into Alewife Brook.

We suggest that Environmental Justice must include these measures that are discussed earlier in these comments:

- Requiring separate financial analyses from Cambridge, Somerville, and MWRA for their CSOs in Alewife Brook and how they might set different sewer rates that could cap rates or provide subsidies for low-income households that might not be able to afford higher rates, as discussed earlier in these comments. This is consistent with longstanding environmental justice principles that environmental justice communities should not bear the burden or costs of pollution that are beyond their control. This also allows MassDEP to reject the variance under its discretionary authority for variances as discussed earlier in these comments.
- Prohibiting new hook ups to the combined sewers that contribute to the CSOs and prohibiting no more than de minimis increases in flows to those sewers, as discussed earlier in these comments. That is consistent with not allowing an increase in environmental burdens to Environmental Justice neighborhoods.
- Clear and timely warnings when CSO activate, and odor control measures, as discussed earlier in these comments. These are important notice and mitigation measures.
- Providing reports to advocacy groups and online sewer maps, as discussed earlier in these comments. Notice and ability to participate depends on timely and complete access to information.
- The use of green infrastructure can enhance neighborhoods, especially those with little green space or trees. As discussed earlier, green infrastructure must be a consideration in meeting CSO goals.

¹⁹ Compare that to the much more extensive outreach required by MEPA: <https://www.mass.gov/doc/final-mepa-public-involvement-protocol-for-environmental-justice-populations-effective-date-of-january-1-2022/download>.

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Alewife Brook without CSO discharges would provide greater important environmental and recreational benefits to the community. It must be our goal. That goal requires MassDEP to designate Alewife Brook as a Class B water. The tentative variance does not get us there. If, however, MassDEP chooses to issue the variance it should include strong and enforceable conditions in the variance that will get us closer to an Alewife Brook that is no longer used as an overflow sewer by Cambridge, Somerville, and the MWRA for their human and industrial sewage wastewaters.

Thank you for the opportunity to comment.

Sincerely,

Eugene Benson, David Stoff, David White, Kristin Anderson

for [Save the Alewife Brook](#)

cc:

State Senator Will Brownsberger
State Senator Cindy Friedman
State Senator Pat Jehlen
State Representative Christine Barber
State Representative Sean Garballey
State Representative David Rogers
Arlington Select Board
Arlington Town Manager James Feeney
Arlington Town Counsel Michael Cunningham
Maria Belen Power, EEA Under Secretary of Environmental Justice and Equity
Deneen Simpson MassDEP Director of Environmental Justice
Todd Borci, EPA Region 1
Mystic River Watershed Association
Charles River Watershed Association
Mass Rivers Alliance