COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133-1053

October 26, 2026

Draft Updated CSO Control Plan Partners
2 Griffin Way
Chelsea, MA 02150

Dear Draft Updated CSO Control Plan Partners:

We submit these comments on the Draft Updated Combined Sewer Overflow Control Plan in advance of the October 30, 2026 public comment deadline, and we urge you to strengthen the Plan before final adoption. As state legislators representing communities along the Alewife Brook, Charles River, and Mystic River, we have a direct interest in ensuring this plan reflects both the public health risks at stake and the MWRA's own commitment to environmental justice.

We appreciate the substantial progress MWRA has made over the past several decades to reduce CSOs and improve water quality. Those investments have transformed our waterways, making it possible for people and wildlife to safely enjoy them to a degree that would have been unimaginable a generation ago. However, CSOs continue to threaten public and environmental health, and their impacts fall disproportionately on under-resourced and marginalized communities.

We want to emphasize that CSOs are a public health issue with broad and long-term consequences. Pathogen transmission and other elevated health risks occur not only through direct contact with contaminated water, but also through exposure to contamination in the surrounding environment. We ask that MWRA more directly incorporate public health data and research into its planning and decision-making, including emerging studies on risks such as aerosolized pathogens from CSO discharges, which can extend exposure beyond people who have direct contact with the water. This research should also inform how and when MWRA notifies the public of discharge events, so that residents near an outfall have the information they need to protect themselves, not just those recreating directly on the water.

An important consideration is that even non-CSO MWRA member communities play a significant role in dictating the flow conditions in the MWRA regional sewer system, and thus available capacity for the downstream CSO member communities. During wet weather events, dramatic flow increases from infiltration and inflow into the upstream community sewer systems, even though they are not designed as combined sewer systems, contributes to added

flow into the MWRA regional collection system, and thus to conditions that cause CSO discharge events.

We request Virtual CSO Elimination, to end sewage pollution in all three rivers, by recommending the 25-year level of control or complete sewer separation. These are reasonable and eminently worthwhile investments in clean water, public health, fish and wildlife, and the outdoor recreation economy, benefiting future generations. These goals are attainable through broad regional, state, and federal investments spread out over several decades.

Finally, we want to express our support for the Alewife Community Plan, which reflects years of community input and offers a concrete, community-endorsed path to reducing discharges into the Alewife Brook. We urge the MWRA to incorporate it into the final CSO Plan.

We appreciate MWRA's leadership in reducing CSOs and improving water quality. We also recognize that pollutants other than those resulting from CSOs affect environmental and public health. That should not be used as a justification for allowing continued CSO discharges; on the contrary, it is an additional argument in favor of CSO elimination.

We urge the MWRA Board to revise the Draft Plan and to commit to the highest level of control, completion of sewer separation, climate-resilient infrastructure investment, and support for the Alewife Community Plan.

We look forward to continuing to work with MWRA, the cities of Cambridge and Somerville, and community advocates to achieve clean and healthy waterways for all. We submit these comments via the online public comment portal and respectfully request a written response addressing the points raised above.

Sincerely,

Marjorie C. Decker
State Representative – 25th Middlesex

Greg Schwartz
State Representative – 12th Middlesex

Amy Mah Sangiolo
State Representative – 11th Middlesex

Steven Owens
State Representative – 29th Middlesex

Mike Connolly
State Representative – 26th Middlesex

David M. Rogers
State Representative – 24th Middlesex

David Paul Linsky
State Representative – 5th Middlesex

Sean Garballey
State Representative – 23rd Middlesex

Erika Uyterhoeven
State Representative – 27th Middlesex

Jay D. Livingstone
State Representative – 8th Suffolk

Carmine Lawrence Gentile
State Representative – 13th Middlesex

Chynah Tyler
State Representative – 7th Suffolk

James C. Arena-DeRosa
State Representative – 8th Middlesex

Samantha Montaño
State Representative – 15th Suffolk

Brian W. Murray
State Representative – 10th Worcester