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The Honorable Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

MWRA Board of Directors
Massachusetts Water Resources Authority
Deer Island, 33 Tafts Avenue
Boston, MA 02128

October 30, 2026

Dear Secretary Tepper and MWRA Board of Directors,

I represent tens of thousands of individuals and families who make their home in the watershed communities in and around the Charles River, the Mystic River, and Alewife Brook. In that capacity, I am **writing to express my deep concern with the direction Massachusetts Water Resources Authority (MWRA) is proposing to take** when it comes to the level of Combined Sewer Overflow (CSO) control in the Draft Long Term Control Plan (LTCP) for these waterbodies.

Before I discuss the LTCP itself, some historical perspective is both important and useful. For over a century, Boston Harbor was essentially used as an open sewer. By many accounts it was one of the most polluted major bodies of water in the United States. Fortunately for all of us, in the 1980s the City of Quincy, the Conservation Law Foundation and the Environmental Protection Agency sued the Metropolitan District Commission, the City of Boston, and the Commonwealth of Massachusetts for Clean Water Act violations, among other claims, related to pollution in the harbor. While reciting the full history of that litigation here is unnecessary, ultimately as a result of this legal action, the Massachusetts Legislature created the Massachusetts Water Resources Authority (MWRA). That is to say the MWRA as an organization owes its very existence to that litigation and to the effort to clean up the waterways; it is at the core of the MWRA's mission and the fundamental driving factor that led to its creation. The MWRA was, and is, tasked with managing the Greater Boston area's water and sewer systems and with leading efforts to create fishable and swimmable waters in compliance with federal law.

The creation of the MWRA and other results flowing from the litigation were nothing short of spectacular. Boston Harbor was transformed and its condition vastly improved. The Deer Island Wastewater Treatment Facility was the centerpiece of the harbor cleanup. Similar to the Big Dig, initially this project faced intense criticism, with angry MWRA ratepayers staging a

second “Boston Tea Party” to declare the project went too far and cost too much. However, MWRA leadership was not swayed, as over 3,000 construction workers, engineers, and support staff traveled to Deer Island daily on a dedicated new ferry service to work on the project. Eventually, the project was completed under budget and ahead of schedule, and it now serves a large percentage of the Massachusetts population.

After 40 years and over $6 billion, a harbor once declared the most polluted in the country is now among the cleanest, where people can enjoy boating, kayaking, and swimming. The 25-year storm level of control along the South Boston beaches has significantly reduced beach closures and earned recognition for some of the safest urban beaches in the country, enabling millions of annual visits to waterfront beaches and parks. Back in 1985, this was an unthinkable goal. After achieving this feat, John DeVillars, former Regional Administrator of the US Environmental Protection Agency, declared, “[w]ithout question, this is one of America’s greatest environmental success stories.”

In my district, the MWRA and City of Cambridge undertook aggressive projects, including sewer separation of approximately 13,500 feet that eliminated the CAM004 outfall, completed in 2015. That project not only focused on sewer separation. There was street work to reduce stormwater runoff including the installation of two miles of porous pavement, six new biobasins with overflow connections, and over 300 new street trees. This work was done in coordination with the creation of the Alewife Wetland Basin, which has provided much-needed relief for our sewer system and has become a vital recreational area for a community where natural green space is hard to come by. The creation of the Alewife Wetland Basin and the extensive street work to close CAM004 are just two of many community projects that have led to an 85% reduction in CSO volume and helped close six CSO outfalls in Alewife Brook.

I devote so much time and space in this letter to laying out past successes to prove the point that the MWRA — working in cooperation with others — is capable of transformative projects at scale. The MWRA is to be commended for those previous successes. The community’s constituents should also be commended for their contributions as MWRA ratepayers in helping to finance the building, maintaining, and operation of the Deer Island Wastewater Treatment Plant and implementing other infrastructure upgrades throughout the region.

It is precisely because of past successes that the current proposal is inadequate. The MWRA is proposing levels of control that are not near the level of control achieved for Boston Harbor. **Why should the residents in the vicinity of Alewife, Mystic, and Charles accept a level of control that concedes the goals of fishable and swimmable rivers**? If it was not good enough for the Boston Harbor cleanup project, why are residents being asked to accept that it is good enough in their communities? Plainly, that is not acceptable. The latest draft proposal for CSO control stalls progress and investment to reduce sewage in our waterways. Given these ongoing Clean Water Act violations, this proposal sets the course not for years but for decades.

All interested parties and stakeholders must develop a solution that ends the long-running scourge of extensive pollution. Hundreds of millions of gallons of sewage continue to discharge into the Charles, the Mystic, and the Alewife. I have heard from many constituents and neighbors who have had CSO discharges flood into their homes, witnessed pedestrians walking through contaminated puddles, and some who have suffered gastrointestinal sickness from exposure to raw sewage. These discharges are a public health hazard and prevent residents from enjoying recreational activities in and around these waterways.

In the original presentation of "Alternatives" in fall of 2025, the Massachusetts Department of Environmental Protection (DEP) expressed concerns about the Long Term Control Plan's direction. DEP stated the alternatives "identified may be insufficient to address CSO discharges and associated impacts," and the proposed alternatives do not appear consistent with the Clean Water Act and Massachusetts Surface Water Quality Standards. After being granted an extension, the currently proposed Draft Control Plans make only minimal improvements. In fact, even after the revisions, plans for the Alewife remain largely at the same level of control as in the original proposal that received the extension. This updated plan is still unacceptable to our community members, who have experienced sewage flooding their neighborhoods, will bear the brunt of sewage discharges for years to come, and will have to shoulder much of the cost to fund the work.

Throughout my time in the Legislature, I have advocated for the elimination of CSOs. This work has included securing multiple earmarks to study and model the effects of dredging the Alewife Brook, supporting and advocating for the CSO notification law that passed in 2021, developing partnerships with local advocacy and watershed groups, and continually filing legislation for the full elimination of CSOs in the state. There is a passionate base of support for the continued elimination of CSOs by local community groups and watershed organizations who call Alewife home. Despite the continued advocacy and support, we will have only achieved success when pollution stops flowing into these waterways. And the current plan does not achieve that goal.

I understand there are many different methods to mitigate CSO discharges. However, the current plan does not fully eliminate CSOs and even projects that more sewage will discharge into our rivers by 2050. The plan lacks the ambition of the Boston Harbor cleanup. It ignores the public health impacts of CSO discharges, which are linked to increased emergency room visits for gastrointestinal illness. This plan is woefully inadequate not only for the current residents of these waterways, but for the generations of community members who will eventually call Greater Boston home. Though there are many ways to reduce discharges, the ultimate "gold standard" for genuinely and comprehensively solving this challenge is sewer separation. The current plan for the Alewife Brook proposes minimal sewer separation, even after the Massachusetts DEP requested a reevaluation of the plan. I respectfully insist that the Long Term Control Plan implement a higher level of sewer separation and green stormwater infrastructure.

We know from experience that these methods have been highly successful in the projects to close CAM004 and create the Alewife Stormwater Basin.

Candidly, my constituents and I are well aware of the scale and the scope of what we are calling for. We do not for a minute downplay the ambition of what we are demanding. Sewer separation on the scale we are contemplating will be a very expensive undertaking. Also, we all know it will involve quite complex and disruptive civil engineering projects. City streets will need to be dug up. Local traffic will be temporarily rerouted while work is performed. We are aware the complexity and expense; and yet it absolutely must be done. To allow the continuing major pollution to go on year after year and simply accept it because of a lack of ambition to finally solve the problem once and for all is unacceptable.

In conclusion, my constituents and I are calling on the MWRA to implement a **2050, 25-year storm level of control for the Charles River, the Mystic River, and the Alewife Brook** under the Final Updated LTCP, analogous to the success seen in the Boston Harbor. The MWRA has a unique opportunity to end CSOs in our critical waterways so we can finally achieve the federal Clean Water Act vision of "fishable" and "swimmable" rivers, keep Massachusetts residents safe and healthy, and stimulate local economies. I respectfully urge the MWRA to recommend virtual CSO elimination for the Charles, Mystic, and Alewife in MWRA's Final Updated Combined Sewer Overflow Long-Term Control Plan and expect you to fulfill your obligations.

Respectfully,



David M. Rogers
State Representative
24th Middlesex District
Arlington, Belmont, Cambridge