

August 4, 2016

MassDEP  
Regulatory Comment Box  
1 Winter Street, 5<sup>th</sup> Floor  
Boston MA 02108

RE: CSO Variance Extension for Alewife Brook & Upper Mystic River

Friends of Alewife Reservation (FAR) is a non-profit whose members are dedicated to protecting and restoring the Alewife Reservation urban wild and its surrounding area. We are concerned with protecting water quality, native plants, animals and over 90 bird species. We encourage responsible public use of the Reservation and promote use of the Reservation for classroom education and research and advance educational programs and projects throughout the 130 acre Alewife Upper Basin area.

This proposed extension to the CSO variance for Alewife Brook represents a critical juncture in the long effort to restore the Alewife Brook watershed as a healthy ecosystem. Much work has been done and much money spent to complete the Long-Term Control Plan. Priority municipal attention is needed in the next three years to evaluate the effectiveness of the work done under the LTCP. And the time has come for a comprehensive watershed-wide assessment and development of a watershed-wide strategy -- to complete the job of meeting water quality goals in the watershed.

Conditions have changed in a number of ways since the original Long-Term Control Plan was developed and then revised in 2003.

- New data has shown that past assumptions about storm frequencies and severities are no longer valid. More recent projections of highly increased rainfall patterns must be incorporated into analyses of future flooding, in predicting CSOs and SSOs, and in optimizing MWRA operations to prevent CSOs.
- Cambridge's Climate Change Vulnerability Assessment, a 4 year study of environmental state educators and leaders:
- <http://www.cambridgema.gov/CDD/Projects/Climate/climatechangeresilienceandadaptation.aspx> has demonstrated how extremely vulnerable the low-lying Alewife region is to flooding under anticipated storm and sea-level rise conditions. Our evolving understanding of climate change impacts reveals that flooding is the result of

complex interactions of sea-level rise, storm surges in Boston Harbor, and the impacts of inland rainfall on water levels in rivers and streams. Accurate predictions of flooding, CSOs and SSOs require taking these interactions into account for safety and health of citizens and businesses.

- Development and redevelopment has occurred at a rapid pace, and substantial new development is being proposed for the Alewife watershed. It is critical that assessments of future water quality conditions take these land use changes into account. It is also critical that municipal permit approvals be informed by an accurate understanding of how additional development and redevelopment will affect local water quality and flooding and that federal regulations be strictly adhered to as well as municipal; and state storm water regulations.
- The anticipated second round of the small municipal stormwater (MS4) permit – expected in 2008 -- was delayed for years. The permit was issued only last April and will not take effect until July 2017. This delay has slowed progress on finding and removing illicit discharges into Little River, Alewife Brook and its tributaries; improving municipal practices that affect storm water quality; and educating the public about its contributions to pollutant stormwater runoff. Until all parties comply with the new MS4 permit municipalities, we will not be able to assess impacts on water quality and determine what further actions are needed and natural resources, and humans who live in the watershed vicinity will not be assured of a safe living environment.
- Since the early development of the LTCP, we have broadened our focus beyond bacteria, to begin to focus on phosphorus, low dissolved oxygen, and other impairments. Further water quality monitoring is needed to identify impairments for additional pollutants and to assess the contributions of CSOs, SSOs and other sources to those impairments.
- We have gained valuable experience with Green Infrastructure and other stormwater Best Management Practices, which will allow a more accurate assessment of the costs of achieving full compliance with Class B standards.

**Completion of work required under the Long-Term Control Plan in December 2015 is a major accomplishment, and appears to have been successful in reducing the number and size of CSOs in the Alewife. However, water quality in Alewife Brook remains very poor with *D-* recently given for main tributary of Little River, and *F* for upstream Little Pond. More monitoring and investigation is needed to identify the continuing sources of bacteria and other pollution in Alewife Brook, Little River and Wellington Brook. We need to**

determine how effective the new Alewife wetland is in treating storm water before discharge to the river. We need to assess efforts by MWRA and the Alewife communities (Cambridge, Belmont, Arlington and Somerville) to reduce inflow & infiltration, and other Nine Minimum Control requirements. And we need to assess how recent and proposed new development and redevelopment will affect flooding, CSO discharges, and water quality.

At the end of the proposed variance extension, we must be in a position to determine what additional steps are needed to reach the final goal – full compliance with Class B water quality standards throughout the watershed – and have a plan for reaching that goal.

The work mandated under this seventh extension of the CSO variance must provide the information needed for such a comprehensive assessment and action plan. **Now is the time to begin collecting the variety of cost, water quality, land use, climate and other information that will ultimately be needed.** We have the following recommendations on conditions that should be included in the variance extension:

- We applaud the plan to broaden MWRA's water quality sampling program to support long-term water quality decisions for Alewife Brook and the Upper Mystic and hopefully expand to the Alewife sub-watershed of Little River and Little Pond whose federal status is D-. This requirement should be expanded to include the full range of necessary data, including new estimates of the costs of further reducing CSOs in the watershed, the costs of reducing SSOs, and the impacts of CSOs and SSOs in different locations to impairments for additional pollutants.
- It is important that the public have early opportunities to comment on the plan for this expanded evaluation, so that the plan finally proposed in December 2016 will in fact adequately support long-term decisions for the watershed.
- There should be no assumptions or plans made a for Alewife Brook and its tributaries that do not include thorough analysis of the costs, benefits and economic impacts of full attainment of Class B standards.
- This analysis should not wait until after the Court-mandated three-year assessment of the LTCP, but should proceed simultaneously with that effort.

Sincerely,

Ellen Mass, President

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