



MYSTIC RIVER WATERSHED ASSOCIATION  
20 ACADEMY STREET, SUITE 203  
ARLINGTON, MA 02476

July 29, 2007

Mr. Mark Casella, P.E.  
MassDEP CSO Coordinator  
1 Winter Street, 5<sup>th</sup> Floor  
Boston, Massachusetts 02108

RE: Tentative Determination to Extend Variance for Combined Sewer Overflow Discharges to Alewife Brook and the Upper Mystic River.

Dear Mr. Casella:

The Mystic River Watershed Association (MyRWA) welcomes this opportunity to comment on the Department of Environmental Protection (MassDEP) proposal to extend the variance for Combined Sewer Overflow (CSO) discharges to Alewife Brook and the Upper Mystic River. MyRWA is a nonprofit grassroots organization committed to the protection and restoration of the natural resources in the 21 communities comprising the Mystic River basin, which includes Alewife Brook. We have over 600 members, including local organizations that work to protect portions of the watershed as well as individuals. We have a stated goal of "fishable and swimmable" waters by 2010. It is from this perspective that we submit the following comments.

This letter presents MyRWA's comments on the proposed variance, as follows:

- MyRWA agrees that a three-year extension of the CSO variance for Alewife Brook and the Upper Mystic River is appropriate.
- We believe that anticipating five back-to-back variances, based on the negotiations that resulted in the revised Boston Harbor Case Court Order, is not appropriate for the Alewife Brook/Upper Mystic variance. Those negotiations included no public input from the Mystic watershed community, in sharp contrast to the negotiations regarding the Charles River variance, and the conclusions that resulted are premature for the Alewife/Mystic variance.
- We urge that specific requirements be added that ensure that the purposes of the variance are achieved. The variance is intended (1) to allow time for implementation of the Long Term Control Plan (LTCP) and (2) to gather information needed to determine the appropriate final Water Quality use classification for these waterbodies. The required information includes water