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 - City of Worcester
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- Bowditch & Dewey, LLC
 - Camp Dresser & McKee, Inc.
 - Weston & Sampson

Massachusetts Department of Environmental Protection
 Attn: Kimberly Groff
 Division of Watershed Management
 627 Main Street, 2nd floor
 Worcester, MA 01608

Via email to: kimberly.groff@state.ma.us

RE: Report number CN 270.2

Dear Ms. Groff:

We are pleased to have the opportunity to submit the following comments of the Massachusetts Coalition for Water Resources Stewardship (the Coalition) on the *Upper/Middle Charles River Draft Total Maximum Daily Load Study*.

The Coalition is an organization of municipalities; public agencies that transport and treat drinking water, wastewater and stormwater; quasi-government agencies and private and nonprofit organizations that are interested or involved in water resources stewardship. The Coalition is comprised of professionals who are committed to the principles of stewardship and sustainability and whose responsibilities include protecting the environment and public health using scientifically based, fiscally responsible approaches to realize environmental and community goals.

The TMDL and wasteload allocations established in the draft report are based on the technical feasibility of phosphorus control for POTW and stormwater sources. While this is one way to approach the development of the phosphorus load that the Charles River can absorb, it does not mean that wasteload allocations should follow suit. This is particularly true in basins such as the Charles, where 75% of the phosphorus is from stormwater and 25% from POTWs. At the very least, all sources should be held to a common percentage reduction, and mechanisms for exchanging phosphorus removal “credits” between POTWs and stormwater should be created. To do as the draft TMDL requires – that the POTWs bear a proportionately greater share of the reduction – sends the wrong economic signal and encourages land use practices that appear to be difficult to control.

The TMDL should evaluate the water quality impacts of dam removal. Here, as elsewhere, dams create opportunities for algal growth. It may be that water quality objectives – and other environmental objectives – can best be met by dam removal.

We are encouraged that the implementation section sets out a phased plan for implementing the TMDL. We think, however, that the implementation plan should be mindful of the capital and operating expense associated with the POTW



improvements. To account for this, and where significant expenditures on the POTW are necessary, the schedule should match the expected reductions in stormwater loads.

Once again, we appreciate the opportunity to submit comments on the Draft TMDL. Please do not hesitate to contact me with any questions. I can be reached at 508-799-1430 or at MoylanR@ci.worcester.ma.us.

Sincerely,
MASSACHUSETTS COALITION FOR WATER RESOURCES STEWARDSHIP, INC.

A handwritten signature in black ink, which appears to read "Robert L. Moylan, Jr.", is placed above the typed name.

Robert L. Moylan, Jr., P.E., President
Commissioner, Department of Public Works and Parks
City of Worcester
20 East Worcester Street
Worcester, MA 01604