

Exhibit 15



United States Department of the Interior

NATIONAL PARK SERVICE

Northeast Region Office

15 State Street

Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

May 28, 2008

Robert Varney, Regional Administrator
EPA – New England
1 Congress Street
Boston, MA 02114

Dear Mr. ^{Bob}Varney:

It was very nice to see you again at the River Management Society conference in Portland, Maine. Your personal inspiration and the commitment of New England EPA to the great rivers of the region is most appreciated. On behalf of the NPS, I will never forget the stalwart partnership of NH Department of Environmental Services through some pretty tough times on the Pemi and Merrimack Wild and Scenic River Studies in the early 1990's. The region's Wild and Scenic Rivers have come a long way since that time, with Connecticut's Eightmile River, as you noted, marking the most recent New England designation and success story.

I am writing to you now to reiterate Lee Steppacher's invitation for you to join us on the Sudbury, Assabet and Concord Wild and Scenic River for a paddle this summer. The agenda would be an informal exploration of how the EPA and NPS can best work together on the SuAsCo, in particular, and, more generally, New England's Wild and Scenic Rivers.

As you know, 29 miles of the Sudbury, Assabet and Concord Rivers were nationally recognized as Wild and Scenic Rivers in 1999. They earned this recognition because of their 'outstandingly remarkable resources' including ecology, recreation, scenery, history and literature. One of the stated purposes of the Wild and Scenic River Act is to protect the water quality of all designated rivers, and if water quality is impaired, to work in partnership with the EPA "...for the purpose of eliminating or diminishing the pollution of waters of the river."

As you know, the Sudbury, Assabet, and Concord Rivers all face serious water quality and streamflow issues. None of these rivers are presently meeting water quality standards, and each of them is feeling the pressures of a growing metropolitan area. The upper Assabet and Sudbury are home to much new development with more construction proposed, Wayland is designing a new town center on the banks of the Sudbury River, while Concord is reaching capacity of their WWTP and still evaluating proposals for more condominiums. All the while, Billerica is withdrawing Concord River water for drinking water.

Important SuAsCo considerations include:

303(d) Listing

Current data, including that which was summarized in the fact sheet for Draft NPDES permit for Wayland, show that nutrients are a major concern in the Sudbury River and that the river exhibits eutrophic conditions.

Based on this data, we would like to discuss amending the Massachusetts 303(d) list to establish that the Sudbury and the Concord Rivers are impaired by nutrients. This reiterates a recommendation made by the SUASCO Watershed Team 5 years ago to list both these rivers as impaired by nutrients.

TMDL's

In addition, we would like the state, with support from EPA, to complete a nutrient TMDL for the Sudbury and Concord Rivers. More complete data and analysis would help determine the capability of the system to withstand any further discharges and pollutants loads. Until that information is developed, there should be no increase in load to the system. In fact, 'common sense' efforts should continue to reduce the phosphorus so the river will move closer to meeting water quality standards.

NPDES Permits

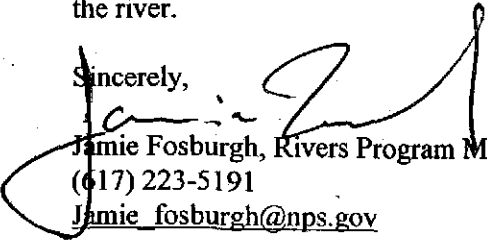
The technology to significantly reduce phosphorus discharges from wastewater treatment plants is available, and the EPA and DEP have shown a willingness to impose low phosphorus limits on the treatment plants on the Assabet. Although these limits will not in themselves be sufficient to meet water quality standards in the Assabet, they are a significant step. Knowing the Sudbury and the Concord are also suffering from high nutrient levels, the same consideration should be given to bringing these rivers into compliance with water quality standards. This is especially true because of their federal wild and scenic designation.

These are just a few of the specific areas of our overlapping interest in the streamflow-water quality-habitat continuum. There are also 6 additional nationally recognized wild and scenic rivers in New England, each with highly significant opportunities for collaboration. For example, the **Lamprey in NH** is currently serving as one of two pilots for instream flow protection, and the **Eightmile in CT** is a watershed-based designation focused on a pristine but threatened hydrology and water quality unique in the state. Each of these rivers, as well as the **Westfield (MA) and Farmington (CT) and Taunton (MA-pending)** is based on a local-state-federal partnership model that offers outstanding protection and restoration potential. Commitments are in place on these rivers from the local community all the way to the US Congress.

We are confident that the EPA shares the National Park Service's commitment to protect and restore these outstanding rivers. Perhaps a day paddling and talking with a small group of staff from each of our agencies can advance our personal and professional capacities to work together to achieve the goals of the Wild and Scenic Rivers Act and the Clean Water Act.

Lee Steppacher (lee_steppacher@nps.gov ; 617 223-5225) will be the point person from the NPS to follow up on this letter. You may also contact me any time using the information below. We look forward to a day on the river.

Sincerely,



Jamie Fosburgh, Rivers Program Manager, NER-Boston
(617) 223-5191
Jamie_fosburgh@nps.gov

Cc: Stephen Perkins, Office of Ecosystem Protection
Lee Steppacher, NPS, SuAsCo WSR
Liz Lacy, NPS, Farmington and Westfield WSR
Damon Hearne, NPS, Eightmile WSR
Julie Isbill, NPS, Lamprey WSR
Jim MacCartney, NPS/TU, River Restoration Specialist