

May 5, 2021

*Via email*

Richard F. Chase  
MassDEP, Bureau of Water Resources  
Watershed Planning Program  
8 New Bond Street  
Worcester, MA 01606  
richard.f.chase@mass.gov

**Re: Comment Period Extension Request – Draft Massachusetts Combined  
2018/2020 Integrated List of Waters**

Dear Richard:

We, the undersigned organizations, write to respectfully request an extension of the 30-day comment period on the Draft Massachusetts combined 2018/2020 Integrated List of Waters (the “draft report”). The draft report was released on April 28, 2021 and comments are currently due on May 28, 2021. **We request that MassDEP extend the comment deadline until July 27, 2021, which would provide a 90-day comment period.**

Unlike prior reports, this is a combined report for both the 2018 and 2020 reporting cycles, meaning there is twice as much content to review and comment on. The entire draft report, including all appendices, is over 3,000 pages. Even watershed-specific commenters need to review over 500 pages (the draft report itself is over 200 pages, plus appendices 1-5 totaling over 150 pages, plus watershed-specific appendices (the Charles River appendix, for example, is another 150 pages)). The draft report contains highly technical information—carefully combing through the data, verifying its accuracy, and compiling comments is no small task. Thirty days is also not a reasonable timeframe for citizen groups, like lake associations, who rely on volunteers and often have no professional staff. Such a short comment period necessarily limits the universe of commenters to those entities who are able to dedicate significant staff and resources to this over the next several weeks, raising equity concerns.

Given all of this, we believe that 90 days is a reasonable comment period for the draft report, which would be a 60-day extension. We would appreciate a response to this request as soon as possible so that all potential participants in the public process know in a timely manner whether the comment period will be extended.

Thank you for considering this request, and please do not hesitate to reach out with any questions.

Sincerely,

Association to Preserve Cape Cod  
Charles River Watershed Association  
Connecticut River Conservancy  
Conservation Law Foundation  
Lake Archer Association  
Massachusetts Rivers Alliance  
Merrimack River Watershed Council  
Mystic River Watershed Association  
Nashua River Watershed Association  
Neponset River Watershed Association  
OARS: For the Assabet, Sudbury, and Concord Rivers

cc: Ken Moraff, U.S. EPA  
Mel Cote, U.S. EPA