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February 9, 2026

Richard Chase

Section Chief, Data Management and Water Quality Assessment
Watershed Planning Program

Massachusetts Department of Environmental Protection
8 New Bond Street

Worcester, MA 01606

Re: Comments on the Draft Massachusetts 2024/26 Integrated List of Waters

Dear Mr. Chase,

The Association to Preserve Cape Cod (APCC) respectfully submits the following comments on the Massachusetts Draft Integrated List of Waters for the Clean Water Act 2024/2026 Reporting Cycles (Integrated Report), proposed by the Massachusetts Department of Environmental Protection (MassDEP) in their undertaking of the biannual review process as required by the Clean Water Act. We understand the need to combine the 2024 and 2026 review cycles due to the necessary work done on reforming the Secondary Contact Recreation Criteria. We support the proposed changes to the Integrated Report and recommend additional amendments as described below.

Founded in 1968, APCC is the Cape region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic. APCC is committed to ensuring that the goals of the Clean Water Act— addressing water pollution “to restore and maintain the chemical, physical, and biological integrity of the Nation's waters”— are properly upheld in the MA Integrated List of Waters review process.

We appreciate the extensive time and energy invested by MassDEP's Watershed Protection Program (WPP) staff in revising the Integrated Report. The Report is an essential component of the Clean Water Act framework, and it is critical that the Integrated List of Waters accurately represents the current designated uses of waterbodies and their impairments in Massachusetts.

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We are pleased to see MassDEP address many of the concerns raised in the comments for the 2022 Draft Integrated Report in the 2024/2026 Draft Integrated Report. Specifically, we commend MassDEP's effort to:

1. Use more current data (refining the timeframe of usable data from 2011 to 2022)
2. Incorporate more datasets and sources used to inform particular listing decisions
3. Update impairment cause terms, such as "trash" vs. 'debris"
4. Include Secondary Contact Recreation Criteria for bacteria in both the 2024 CALM Guidance Manual and 2024/2026 Integrated Report

APCC appreciates that these changes streamline the regulations and make aquatic recreation activities safer for the public. However, the draft Integrated Report should be strengthened in a few important ways. **We urge MassDEP to incorporate the following recommendations.**

First, water quality monitoring groups across the state, including our organization, submit quality-controlled water quality data to MassDEP annually, which is often more thorough and up to date than internal state agency data. However, MassDEP frequently will not give feedback to a specific group when its data is submitted and that data is often not used in the Integrated Report. Excluding data collected by credible third parties is a disincentive to groups looking to supplement the Department's own ability to generate better quality data. **We urge MassDEP to provide more effective feedback so that water quality monitoring groups can provide better data that is used to make the Integrated Report more accurate.**

Second, MassDEP has previously proposed adding Coldwater Fishery Resource designations to the Surface Water Quality Standards and previous iterations of the Integrated Reports. Many Massachusetts waterways play a critical role in the reproduction and survival of cold water fish species, a resource vital to the state's economy and ecosystems. **We encourage MassDEP to add any remaining Cold Water designations to the Report, as it would highlight threats to these important resources.**

Third, **we recommend that it be more widely publicized that comments and suggestions for assessment methodologies are welcome anytime.** Previous changes to the CALM Guidance Manuals, such as the change of Aquatic Plants (Macrophytes) from a pollutant to a non-pollutant in the 2022 CALM Guidance Manual, were met with confusion and anxiety over the subsequent effects of this change in the water quality monitoring community. The information about CALM Guidance Manual Changes being more widely known would lead to improvements in methodology on a quicker timeframe.

On behalf of APCC, thank you for considering these comments and suggestions.

Sincerely,



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