Public Comments on the July 30 2025 draft of the 2025 CCMP update

Comment
1) Under Action Plan 6 on page 73, Table 7, New Bedford is shown to have a total of 285 moorings, but the Port Authority website states they have 496 moorings available (https://portofnewbedford.org/mooring-regulations/)
2) Original Paragraph on page 173: “Between 2008 and 2011, CZM’s StormSmart Coasts Program provided “direct in-community" technical assistance to seven communities on five pilot projects to demonstrate the application of storm smart principles in local plans and processes. To support these pilot projects, CZM provided information on projected sea level rise scenarios and guidance on applying sea level rise projections in vulnerability assessments and local planning and decision making.” Corrected to: “Between 2009 and 2011, CZM’s StormSmart Coasts Program provided “direct in-community" technical assistance to seven communities on five pilot projects to demonstrate the application of coastal resilience strategies in local projects. To support these pilot projects, CZM provided guidance on incorporating projected sea level rise scenarios in community vulnerability assessments, public outreach, and local floodplain management regulations. In 2013, CZM published *Sea Level Rise: Understanding and Applying Trends and Future Scenarios for Analysis and Planning* to assist coastal communities in Massachusetts in considering and applying future conditions in current, local planning processes.”
3) Original sentence on page 173: “In 2011, CZM updated its program plan with these goals:…” Corrected to: “CZM also updated its program plan in 2011 with these goals:…”
4) Suggested to delete this paragraph on page 173: In 2013, CZM published a guidance document on understanding and incorporating sea level rise for planning that could be used by all Massachusetts coastal communities begin to consider future conditions in current planning processes.
5) On page 173, original sentence: “In 2014, following on the success of the StormSmart Coasts pilot projects and sea level rise guidance publication, CZM launched the Coastal Resilience Grant Program to provide financial and technical assistance for local and regional efforts to increase community understanding of coastal storm and climate impacts, evaluate vulnerabilities, conduct adaptation planning, redesign and retrofit vulnerable public facilities and infrastructure, and restore shorelines to enhance natural resources and provide storm damage protection. Since 2014, the Coastal Resilience Grant Program has invested over $6 million in grant funding for 36 projects in Buzzards Bay communities (Dartmouth, Falmouth, Marion, Mattapoisett, New Bedford, Wareham, and Westport).” Changed to: “In 2014, CZM launched the Coastal Resilience Grant Program to provide financial and technical assistance for local and regional efforts to increase community understanding of coastal storm and climate impacts, evaluate vulnerabilities, conduct adaptation planning, retrofit and relocate vulnerable public facilities and infrastructure, and restore shorelines to enhance natural resources and provide storm damage protection. Between 2014 and 2025, the Coastal Resilience Grant Program has invested over $6 million in grant funding for 36 projects in Buzzards Bay communities (Dartmouth, Falmouth, Marion, Mattapoisett, New Bedford, Wareham, and Westport).”
6) Original paragraph on page 173: “In 2023, Massachusetts launched the Resilient Coasts initiative, described as a holistic strategy to address climate impacts along the Massachusetts coastline of Massachusetts. The CZM-led initiative will identify regulatory, policy, and funding mechanisms for long-term solutions. CZM will establish Coastal Resilience Districts based on expected climate impacts and develop a coastal resilience strategy for each area of the coast. The state’s ResilientMass Plan will define how the state will withstand, rapidly recover from, adapt to, and mitigate after natural hazard events. The plan will review resilience options to proactively identify approaches that work statewide and within districts, explore financing mechanisms to find creative and sustainable ways to pay for projects, and review regulations to ensure effective long-term implementation.” Suggested change: “In 2023, Massachusetts launched the ResilientCoasts Initiative, a holistic strategy to address climate impacts along the Massachusetts coastline of Massachusetts. The CZM-led initiative aims to develop a comprehensive statewide approach to coastal resilience including identifying regulatory, policy, and investment strategies the state can lead to accelerate the pace of resilience. The ResilientCoasts Plan establishes 15 Coastal Resilience Districts based on shared risks and characteristics, to inform the scale of regional collaboration on coastal resilience. The ResilientCoasts Initiative is embedded within

ResilientMass, which is the umbrella initiative for the state's climate adaptation and resilience programs, policies, and plans. The ResilientMass Plan, which serves as the State Hazard Mitigation Climate Adaptation Plan, defines how the state will withstand, rapidly recover from, adapt to, and mitigate after natural hazard events. The plan, which is updated on a five-year cycle, reviews resilience options to proactively identify approaches that work statewide and within regions, explore financing mechanisms to find creative and sustainable ways to pay for projects, and review regulations to ensure effective long-term implementation."
7) Original comment on page 175: "CZM will need to update and complete the existing draft document entitled Assessing Potential Environmental Impacts of Offshore Sand and Gravel Mining for the Purposes of Beach Nourishment…" Requested to change "existing" to "2000"
8) Action Plan 1: Page 24 of the plan fails to recognize the unique watersheds of Buzzards Bay such as the Slocums River which by the EPA approved TMDL reveals that sources of nitrogen outside of wastewater can be as significant.
9) Action Plan 1: No mention of composting as a source of nitrogen and has been widely noted as being a new source of pollution that did not exist at the turn of the century.
10) Action Plan 1: No mention of stale data and shifts in sources of nitrogen affecting specific sub-watersheds of Buzzards Bay. Failing to recognize the evolution of sources of nitrogen can be problematic to protection of the sub-watersheds to Buzzards Bay.
11) Action Plan 1: No mention of the new goal of the current Executive and Legislative branches of the Commonwealth of Massachusetts to increase housing stock at nearly all possible means.
12) Action Plan 1: Page 27 of the plan within objectives fails to address regulatory limitations or to define roles of the various regulators such as limitations of municipalities and ability of state regulators such as MassDEP to address regulated sources of nitrogen that have been ignored like compost leachate discharge to surface waters and groundwater, confined feeding operations discharge to wetlands and biosolids overuse without demonstrated need (Dartmouth has documented a one year equivalent load on one farm that had the same amount of nitrogen as 700 four bedroom homes).
13) Action Plan 1: Page 27 of the plan within objective 1.9 fails to address water clarity being influenced by other sources such tannins that can provide a catalyst for warming or shading.
14) Action Plan 1: Page 27 of the plan within objective 1.10 fails to address water temperature changes on sub-watersheds of Buzzards Bay that are highly developed and how the first flush can affect ambient temperature of the receiving waters.
15) Action Plan 1: Page 27 of the plan within objective 1.16 is a catch all to address water quality impairment from nitrogen, however, the catch all and prior objectives do not call out the new sources of nitrogen created by MassDEP de-regulation of solid waste for composting and the increased sources of nitrogen from sewering rural areas such has occurred in Dartmouth and the downstream impacts from the impervious areas from poor to no stormwater mitigation of nitrogen that enters the system via loss of the natural environment.
16) Action Plan 1: Page 27 of the plan within Management Approaches notates MassDEP as one of two government leads for many actions is misleading. MassDEP has not led but ignored new sources and failed to enforce existing standards on contributing sources such as point source and non-point source discharges. This may be an introductory opening of the document but continuing to hide or pretend that all is well with government performance when it is not, is only making a matter worst.
17) Action Plan 1: Page 28 of the plan within Management Approaches notes MassDEP's vision statement in the Massachusetts Vision 2.0: Clean Water Act Section 303(d) and Total Maximum Daily Load (TMDL) Development as the TMDL being feasible depending on several factors, however, this is misleading in the current political environment. We are seeing Beacon Hill initiatives and mandates to force added housing development in municipalities without equal consideration of the local requirements that may have prevented such. This is without question an emerging problem to the estuaries of Buzzards Bay as it increases buildout which will regardless of sewer connection increase impervious area, increase lawn area and increase pet waste all of which are sources of

nitrogen.
18) Action Plan 1: Management Approaches fails to address nitrogen from composting and shifts in agricultural practices to backyard feedlots.
19) Action Plan 1: Costs and Financing with respect to sewer extensions, service connections to mains and onsite wastewater disposal system construction is volatile and we are seeing prices for work on private properties for connection and septic system replacement exceed the estimates in this section.
20) Action Plan 3: Goals should be more descriptive in Objective 3.6 to require above ground treatment systems over strictly below ground systems and to create an regulations for operations and maintenance to assure intended functionality.
21) Action Plan 3: Green Infrastructure and Low Impact Development are disinterested with the campaign we are experiencing for affordable housing. In fact, we have an Executive Order that implies that environmental regulations are an obstacle in creating more housing. This is contradictory and with any expansion of sewers to unsewered areas many towns that discharge to Buzzards Bay or the estuaries of Buzzards Bay will see 40B development proposals that sidestep local regulations and utilize every acre of upland. State regulations must address this sidestep and assure parity of environmental regulations for all developments.
22) Action Plan 5: Assessing the nitrogen load from septic systems is problematic. If we are seeing less people per household due to declining birthrates and the corresponding aging population the estimated load will be in excess and thus revealing other underestimated sources of nitrogen.
23) Action Plan 5: Cost and Financing for onsite wastewater management is volatile and outpacing inflation due to the reliance on natural resources that are becoming scarcer due to buildout of Bristol and Plymouth Counties, however, the cost for a septic system in a rural area where sewer was not envisioned by early master plans will still be lower than installation of sewer mains in the street, other supportive sewer infrastructure needs and service connection. MassDEP needs to revisit sizing requirements for the disposal area when advanced treatment systems are installed for all types of construction (new or upgrade). Regulators have not undertaken a study on the minimally needed capacity for leaching area when high quality effluent is discharged from an advanced treatment unit. Doing such may persuade homeowners if they can save money now and reduce expenses later should failure occur. Currently, in Dartmouth we have not observed a soil absorption system failure that receives effluent from an advanced treatment unit.
24) On pages 66- 67 it says: "*Between 2000 and 2020, EPA approved dozens of watershed nitrogen TMDLs for Cape Cod and Buzzards Bay embayments. In most of the studies, onsite nitrogen systems were the primary source of nitrogen contributing to coastal eutrophication. In July 2023, MassDEP amended Title 5 to require within three years the upgrade of all onsite systems in the watersheds of nitrogen sensitive areas on Cape Cod to best available nitrogen reducing technology If the municipality does not adopt a local watershed plan to meet EPA approved coastal watershed nitrogen TMDLs. In 2026, MassDEP will apply these same requirements to municipalities on the western shore of Buzzards Bay."* Cape Towns filed an NOI which stays the application of upgrade requirement in those communities. It may be worth mentioning in that section. NSAs will not be designated on the Western shore of Buzzards Bay in 2026. Suggested new wording: Between 2000 and 2020, EPA approved dozens of watershed nitrogen TMDLs for Cape Cod and Buzzards Bay embayments. In most of the studies, onsite nitrogen systems were the primary source of nitrogen contributing to coastal eutrophication. In July 2023, MassDEP amended Title 5 to require within seven years the upgrade of all onsite systems in the watersheds of nitrogen sensitive areas on Cape Cod to best available nitrogen reducing technology if the municipality does file a Notice of Intent to apply for a Watershed Permit stating the municipalities' intention to adopt a local watershed plan to meet EPA approved coastal watershed nitrogen TMDLs. Each of those communities with a Nitrogen TMDL and covered under an area-wide 208 plan filed a Notice of Intent, thereby tolling the Title 5 requirement to upgrade onsite septic systems. MassDEP has not yet issued a nitrogen TMDL to any of the watersheds on the western shores of Buzzards Bay. Excluding Bourne, none of the watersheds on the western shores of Buzzards Bay are covered by an approved area wide 208 plan. As a result, Nitrogen Sensitive Areas have not been designated in those communities, therefore the Nitrogen Sensitive Area provisions of Title 5 do not yet apply in those communities.
25) Please add a hyperlink for the MA Water Resources Commission (page 114) so folks can easily access the webpage and associated resources.
26) Please add "MassDEP" to the Acronyms Used section (page vii)

27) Suggested Additional Goals:

Goal 10.4: Promote Water Conservation and Efficiency Across All Sectors - Encourage and support the adoption of water-efficient technologies, practices, and policies in residential, agricultural, commercial, and industrial sectors to reduce overall water demand and mitigate impacts on freshwater sources. Reducing water demand is a cost-effective, immediate way to balance water supply and ecosystem protection.

a. **Goal 10.5: Integrate Climate Change Projections into Water Management Planning** - Incorporate current and projected climate data (e.g., precipitation patterns, drought frequency, sea level rise) into water withdrawal and recharge planning to ensure long-term resilience of water resources and dependent ecosystems. Climate change should be integrated into adaptive planning because it will intensify water availability challenges.
b. **Goal 10.6: Enhance Monitoring and Data Collection of Water Withdrawals, Groundwater Levels, and Ecosystem Health** - Establish or expand continuous monitoring networks to track the cumulative impacts of water withdrawals, land use changes, and climate metrics on surface and groundwater systems and associated habitats. Robust data on water use and ecosystem conditions will help guide effective decisions and assessment of impacts.
c. **Goal 10.7: Promote Green Infrastructure and Low-Impact Development (LID) to Support Natural Recharge** - Encourage municipalities and developers to use green infrastructure (e.g., rain gardens, permeable pavements, bioswales) and low-impact site design to enhance groundwater recharge and reduce stormwater runoff to help maintain the natural hydrologic cycle, especially in developed areas.
d. **Goal 10.8: Collaborate with Municipalities to Align Local Policies and Zoning with Watershed Protection Goals** - Work with local planners, conservation commissions, and zoning boards to update bylaws and local water policies that support regional freshwater management objectives and ecosystem protection because local decisions directly affect water withdrawals, land use, and recharge areas.

28) Page 2, Figure 1 Buzzards Bay NEP study area- Can the outline color of the NEP area be changed from blue to red? The blue is blending with the ocean color to my eyes.

29) Page 8, Change from first person to third person to match plan section : By 2009, **we** considered 61 of these remaining 112 CCMP recommendations largely complete with significant progress on many of the remaining recommendations.

30) Page 9, Change first person to third person to match plan section: **We** dropped the chapter titled Pollution Remediation Projects in New Bedford and interspersed relevant actions into other action plans.

31) Page 16, Paragraph above references CSO's and then this sentence spells out CSO. Change to make consistent: In Action Plan 1, increased precipitation intensity may increase the frequency of discharges from combined sewer overflows.

32) Page 16, Add drinking water before wells to make clear: The Town of Fairhaven lost one of its wells to this effect after Hurricane Bob in 1991.

33) Page 20, Punctuation needed: The original CCMP and successive updates are fully consistent with Clean Water Act Section 320 (b) [purpose of the Management Conference]

34) Page 27, Should total maximum daily load implementation plans be called nitrogen management plans? Objective 1.1. Promote the development and execution of local Total Maximum Daily Load implementation plans to manage nitrogen sources to meet Total
Maximum Daily Load limits and waste load allocations.

35) Page 27, Objectives 1.2 and 1.3 are not written as actions, should the wording be adjusted to reflect that the state should do xyz?

36) Page 27, Can objectives be renumbered to be organized by what is being recommended for local municipalities, what the state needs to do, regulators, etc.

37) Page 36, Add year to figure 21 title and caption.
38) Page 44, Should goal 3.3 say manage or promote management...?
39) Page 57, Recommend moving these figures. As is they separate the pages with the objectives on them.
40) Page 64, Spacing issue around footnote 31 within text
41) Page 69, Clarify what strategies you are referring to? Are you discussing strategies for septic systems or landscape strategies, in pond strategies, etc? Objective 5.7. In areas around freshwater ponds, where excess phosphorus is causing reductions in surface water quality, promote strategies and technologies to reduce the phosphorus loading to the pond.
42) Page 80, Text edit suggestion to more simply state the gap/problem- suggest: “Confounding stormwater management is the fact that the Stormwater Handbook, last updated in 2008, does not fully address cumulative loading control necessary to meet bacteria and nutrient TMDLs (Action Plans 1 and 3) and MS4 permit requirements.”
43) Page 83, Is 7.12 supposed to be here? I don’t feel like it fits well in this section as there was no discussion about eelgrass.
44) Page 97, Check formatting in figure 46 caption and page number
45) Page 101, Text edit suggestion to make the goal 8.1 more clear, suggest: “Remove barriers that prevent fish from migrating between saltwater and freshwater habitats.”
46) Page 108, Text Edit Suggestion- Make Table 14 caption more clear, # of towns reporting a species... what are they reporting to?
47) Page 115, Edit table column headers for Table 16- edit so year is first in each column header label
48) Page 118, Figure 54- It is difficult to see the color differences between the “Zone II” and “Developed Areas...” in the map. Suggest alternative colors to make the two mapped areas stand out more.
49) Page 120, Text edit suggestion for Goal 10.1: 1. “Manage drinking, irrigation, and industrial water withdrawals to protect groundwater and surface water, ensuring a sustainable, high-quality drinking water supply across the Buzzards Bay Watershed.”
50) Page 134, Text edit suggestion for objective 12.4, suggest: “Objective 12.4 Protect land that supports salt marsh migration with sea level rise and provides connectivity to other habitats.”
51) Page 143, Text edit suggestion for goal 13.1 and 13.2 to simplify, suggest: “Goal 13.1. Protect beneficial water uses and ecosystems in the Buzzards Bay watershed from pollution, invasive species, climate impacts, and flow changes.” and “Goal 13.2. Restore beneficial water uses and ecosystem functions in freshwater systems of the watershed affected by pollution, invasive species, or changes in flow.”
52) Page 143, Since wastewater strategies are mentioned, should this address surface waters and groundwater? As listed, “Objective 13.7 Encourage wastewater and stormwater management strategies that minimize direct and indirect phosphorus discharges to surface waters.” Suggest adding ...”to surface waters and groundwater.”
53) Page 155, Text edit suggestion to clarify the “bay,” suggest: “Goal 15.1. Protect public health and the Buzzards Bay ecosystem from the effects of toxic contamination.”
54) Pages 176 and 184, Blank, unnumbered pages

55) Page 182, Text edit suggestion: Adjust Goal 18.1 to reflect the pollution is in the water, suggest: “Goal 18.1. Reduce or eliminate pollution sources that cause elevated bacteria levels in beach waters.”
56) Page 205 and 207, Remove Coastal Pollution Remediation Grant section, and edit Coastal Habitat and Water Quality section to say the following: Coastal Habitat and Water Quality Grants Program Agency: CZM Formerly called the Coastal Pollutant Remediation Grant Program, the Coastal Habitat and Water Quality Grants provides funding for projects that assess and treat stormwater pollution and support comprehensive habitat restoration planning. Eligible project activities include, but are not limited to: 1) Efforts to assess, identify, and characterize nonpoint source (NPS) pollution impacts from stormwater runoff to coastal waterbodies; 2) design and construction of stormwater structural Best Management Practices (BMPs) (priority is given to practices that address contaminants of concern in coastal waterbodies); 3) capacity-building activities—including trainings for municipal staff, bylaw development, and case studies—that support future implementation of green stormwater infrastructure (methods that replicate natural processes to trap and filter stormwater prior to reaching local waterbodies); 4) development of habitat restoration plans, including data collection and synthesis, natural resource assessments, and restoration prioritization work; 5) advancement of priority land acquisition planning activities for the purposes of restoration, buffer protection, and/or future marsh migration. Eligibility: Municipalities within the Massachusetts coastal watershed, along with federally recognized Tribes, certified 501(c)(3) nonprofit organizations, regional planning agencies, and stormwater collaboratives in partnership with eligible municipalities.
57) Pages 124-129, Double check section for copyedits/grammar. (Proper capitalization, e.g., the second sentence under the **Prevention** heading, first letter of sentence not capitalized: “**B**oth the 1991 and 2013 CCMP discuss problems associated with the discharge of boat bilge water.” And subject/verb agreement, e.g., “Monitoring also document**s** trends and help**s** discerns pathways of invasive migrations and help inform policy decisions and devising regulations.)
58) Page 126, Sentence incomplete, suggested edit: “**At the** Federal, State, and local level**, various** funding pathways, management strategies, and response efforts **exist to attempt to manage or remove established or emerging introduced species.**”
59) Sometimes footnotes are used, sometimes links, sometimes in-text citations. I recommend standardizing this throughout the doc. Also, I believe footnotes usually go after punctuation marks, like periods.
60) Pages 80-94, There are some important actions items in this section related to coastal wetland restoration, hydrologic restoration, and marsh migration, but these topics aren’t contextualized in detail nor are specific approaches to restoration detailed. Further details on the current landscape of coastal wetland restoration could strengthen this section. This could also be a good section (or in the climate impacts section) to mention CZM’s Sea Level Affecting Marshes Model or Marsh Migration Area mapping tools to support planning around marsh migration.
61) Page 84, In the Costs and Financing section, Federal and State grant programs that fund coastal wetland restoration project could be detailed here – or at least alluded to. For example, CZM’s Coastal Habitat & Water Quality Program, DER’s Grants for Priority Projects, DER's Partnerships Program, and MVP, among others, have funded wetland restoration projects. Federal programs like USDA NRCS are very involved in funding salt marsh restoration projects in Massachusetts.
62) Page 110, Federal Endangered Species Act: Recommend briefly mentioning/linking IPaC--it is the official pre-consultation resource for determining initial species lists. Link: IPaC: Home
63) Page 107, Typo: “focuses”
64) Suggest adding map/link to Mass marsh migration data layer somewhere in the Wetlands chapter
65) Objective 17.8 is the same objective as 7.8/7.9—is this supposed to be repeated, or could it just refer back to the 7.8 objective in section 17 to avoid confusion?
66) “Monitoring of coastline shifts, and salt marsh loss should continue, and efforts to maintain marsh area, like thin sediment layer deposition, runnelling, removal

of impediments to marsh migration, and acquisition of marsh migration corridors should continue to be supported and studied." Recommend rephrasing this to make clear these methods are not always supported in all restoration situations. Suggested text revision: "In an effort to maintain the health and longevity of salt marshes, we support further monitoring and studies about shifting coastlines, thin sediment layer deposition, runnelling, and the removal of impediments to marsh migration.