
**R.I. Bays, Rivers & Watersheds Coordination Team
Public Advisory Committee**

**Minutes – June 16, 2008
Save the Bay Center
Providence, RI
10:00 a.m.**

Members attending: Jack Schempp (Environment Council of RI); Greg Gerritt (Green Party RI); Larry Taft (Audubon Society of RI); Meg Kerr (Narragansett Bay Estuary Program); Matt Auten (Environment RI); Ames Colt (Chair, RI Bays, Rivers and Watersheds Coordination Team)

Chaired by Chip Young (URI Coastal Institute); co-chair, Jane Austin (Save the Bay).

Notes:

- Meeting did not constitute a forum. For discussion only.
- Handouts #1 and #2 of prior comments to the Systems-Level Plan that was discussed were distributed to members and are attached at the end of the minutes.

Following introductions and distribution of handouts, RI Bays, Rivers and Watersheds Coordination Team (CT) chair Ames Colt gave a briefing on the draft CT Systems-Level Plan (SLP).

Intentions were to have the draft completed by June 23, but it does not appear it will be approved by then. There is still a need for more public review, and incorporation of such things as performance measures, if that is possible. He asked that the Public Advisory Committee (PAC) think of ways to leverage opportunities to get agencies working together on the SLP and upcoming inputs such as performance measures.

Colt mentioned there were needs and concerns:

- Find a way for the CT to be able to do what the statutory legislation demands.
- How to go forward?
- He was not particularly encouraged by level of CT members buy-in. This must be cultivated within the next six months.
- The Ad Hoc advisory committee has bought in.
- Agencies have to get MOUs to implements the SLP, particularly in regard to their budgets.
- There is too much overlap right now among CT agencies. The SLP can help the linkage among agencies
- There is a need to discuss with Statewide Planning how the SLP will relate to the state's Guide Plan, as the Dept. of Planning has the upper hand in deciding the direction within the Plan.

The meeting was then opened to questions, with Colt responding:

How substantial were changes in the most recent re-write of the SLP? The distributed comments noted many omissions. SLP is also too marine-oriented.

AC: There is a long way to go with changes and additions. The Water Resources Board has already re-written the water section, and CRMC has added more on aquaculture and invasive species. Freshwater issue will be further expanded, and a section on rivers, streams and lakes may be added.

Are we creating top 10 priorities—should be. Why not let CRMC, DEM and Statewide planning be the key players in priorities, because they are?

Group responses: OK, but DEM still is not included as much as they should be.

We need top 10 immediate priorities and actions. Is the top 10 conveying what we really need? DEM and CRMC might not overlap. There have to also be top 10 preliminary priorities for them to use in their work plans.

We have the same problem with agencies with the watershed approach. Until you confront them and make them commit, they don't.

What do Colt and the CT envision for performance standards?

AC: A mix of quantitative and numerical standards much like done in the work by the Partners for Narragansett Bay's tri-state Special area Management Plan proposal of a few years ago. They also had "vision document," but the CT is reluctant to go in that direction. There is a need to look at both environmental and economic outcomes and outputs. The Narragansett Bay Estuary Program's *Status and Trends Report* could lead in that direction. Look at Buzzard's Bay CCMP.

PAC suggestion: Need to encourage CT to move towards measurable targets and timelines. It is a natural response for agencies to balk at this. Public cares about results, not process. "How clean is my Bay?" Try a public scorecard process. You might get pushback from CT, but it is what the public wants.

AC: We do have some outcome standards and indicators, but they don't engage the public well. There is no process to make the numbers understandable.

What can we do with more financial resources?

AC: We are trying to develop a database on agency funding and where the money comes from. One place to look is to see what is the state of the agency budgets; who puts in what amount.

PAC suggestion: Work here with available info, esp. tying it to performance measures. Availability a problem. We should frame that kind of work as a "We're here to help you" approach. Make the budget numbers an element of a proposed monitoring piece in each agency, which can evolve into a scorecard. Reference here to NHS "BORIS" database consolidation, and TNC Heritage 10-year project, both for one-stop shopping for data.

Group says we need as priorities:

- Environmental database/indicators
- Need to communicate them effectively and understandably to the public
- Need transparency among agencies and public—first thing cut at agencies is communications
- Look at agency implementation: regs, spending, budgets
- Do agency performance measures and indicators

Agreed upon next steps in review of SLP:

- Put out a final draft, not a final, unchangeable version. Provide more opportunities at all levels, including public review.
- Need concrete, written commitment to a couple of priorities for each agency, which are in both the agency work plan and the CT work plan.

Agreed upon next steps for action by PAC:

- Review BORIS
- Push for priorities and a first cut at indicators
- Try to produce more understandable data by making it clearer and with what the results would be.

Meeting adjourned at 11:40 a.m.

Minutes submitted by Chip Young

HANDOUT #1 FOR PAC MEETING 6/16/08

The following miscellaneous comments are excerpted from the draft meeting minutes of the May 28 meeting of the Coordination Team:

- There was general concern expressed over the content of the SLP in terms of changing legislation. Colt was concerned about major legislative mandates that would not be captured in the plan. Kiernan recommended that if the legislation is altered, it must be reflected in the plan, but they should not try to capture everything that everyone is doing at once.
 - o Mariscal observed that the only fiscal year this plan could possibly have an impact on is 2010, but the title page says 2008-12. Colt concurred and said that this could be changed. He asked members if they wanted to start with 2009 instead.
- Walker responded to Mariscal's comment by saying that plan's objectives would not be accomplished within three updates, so what is there to amend? They would be constantly updating the document.
 - o Mariscal said that if that is the case, should they simply not have a date? Is this going to be a plan that is worked on by any at any time? Walker answered – yes.
 - o Colt interjected by saying that he felt 4-5 years was a good time period for a plan.
 - o Mariscal cautioned that the longer the document gets, the less likely it is to be read. People will be looking for specific “to do” lists within the plan, so they must be included.
 - o Colt said that the final document will be approximately 20-25 pages longer than it is now. They must develop an executive summary for the people who cannot read the entire thing. He is holding out on a priority list until the Fall.
 - o Flynn commented that he noticed there are a lot of things in the plan that are never going to be completed. The strategies are all ongoing, continuous activities as opposed to specific actions. He asked if Colt is planning to prepare a list of more specific actions. He said that this was not a criticism, but a general question about how detailed the team wants the plan to be?
 - o Colt replied that if the strategies are too general, then the team needs to work to make them more focused. That will be a challenge, however, as everyone is very conservative in the current fiscal climate. He would like to have the language in the columns to reflect a 4-5 year orientation.
 - o Flynn asked if Colt wants to have all of the columns filled.
 - o He answered that he would like to fill up the CT actions more. Of course there will be some blanks, but a lot of this will be based on best professional judgments. The point is to put together a document that will allow them to do some planning/budgeting. In terms of communication to the public, other more synthesized documents will be necessary.

I've also received a number of informal comments through one on one meetings. I will be happy to brief the PAC further at tomorrow's meeting.

HANDOUT #2 FOR PAC MEETING 6/16/08

RI Bays, Rivers, and Watersheds Systems-Level Plan Public Review Draft

Comments received as of June 6, 2008

Rhode Island Rivers Council's Discussion and comments

At the RI Rivers Council meeting of May 14, 2008, Ms. Sherman welcomed Mr. Colt and thanked him and his team for their significant effort in pulling together the document we are reviewing today. Ms. Sherman indicated that the Rivers Council would collectively discuss each of the plan elements.

Ms. Morrill requested that the members of the Team be listed in the document, and suggested a number of detailed changes which she will send to Mr. Colt. Mr. Colt acknowledged that many had commented that the document was dense, and challenging to read. He noted that the primary audience for this document includes the agencies, General Assembly, activists and the informed public, and that every effort will be made to present more user-friendly information for the general public that is less involved in the technical details of the information to be covered. Mr. Colt noted that the tables at the end of each section needed more work, and that long-term actions needed to be identified.

Mr. Lefebvre raised the question of the meaning of the word stewardship, noting that for one group he belongs to, stewardship means financial support. Mr. Nelson requested that a glossary be developed and it should include a list of abbreviations used throughout the document. Mr. Lefebvre complimented the chart on page 13 headed by Programs, Policies.

Waterfront and Coastal Development: Ms. Sherman noted that the word "waterfront" can apply to coastal as well as river shorelines, but the document does not seem to reflect that, nor does it reflect the issues surrounding riverfront development. The draft discussion is limited to coastal waterways, and much more information about riverfront development needs to be included. These developments go beyond the jurisdiction of CRMC, and RI DEM's role in addressing development beyond the CRMC jurisdiction should be discussed.

In addition, this section fails to anticipate adequately climate change beyond sea rise – that is – the impact of more intense storms and long periods of drought on the river systems and how development patterns need to incorporate this new awareness. River flooding is already a major issue along some rivers in Rhode Island. Mr. Lefebvre suggested the linear mileage of several of the state's major rivers could be cited.

Watersheds: Mr. Baer noted that the document seems to emphasize the protection of healthy habitats, omitting the important need for remediation and restoration of degraded habitats. It was noted that these issues were to be addressed in the Water Quality section, but were not included.

There was a general consensus that the document needs to have much more information about riverfronts, including the impact of development faced by many of our freshwater river assets. Mr. Lefebvre requested that watershed councils be included in the table at the end of this chapter. Mr. Nelson remarked that this chapter is a key chapter, linking land use to water quality. He requested that Land Use 2025 and the Rivers Policy be incorporated into this document, and that the issue of the need to work more effectively with local governments on land use documents is critical.

Mr. Millar noted that State and Federal agencies have important roles to play regarding the protection of water quality, but communities via their local land use authority have the primary responsibility and there is no one charged statutorily with assisting local governments to utilize effective land use management. Ms. Green indicated that there is growing interest and concern in reviewing local zoning proposals to ensure that they are consistent with local comprehensive plans. Mr. Nelson responded that the State cannot challenge local zoning if it is not consistent with the comprehensive plan and that any challenge needs to come from residents. This is a major gap which should be addressed -- it may require legislation -- and perhaps the CT should consider this as an item to be included in the document.

Mr. Millar stated that zoning documents that are in fact generally consistent with comprehensive plans and the State Guide Plan but may still not be protective of the environment, particularly where communities rely on large lot zoning which accelerates impacts to water quality by adding more impervious cover and disrupting natural drainage areas than does compact growth. Clearly more specific tools are needed to ensure that towns comply with Phase II stormwater regulations and promote projects that implement low impact development designs.

Ms. Sherman requested that the Governor's goal of fishable swimmable rivers by 2015 be included in the goals of this document. She also commented that there is an absence of references to DEM and its authority to protect headwaters, wetlands, etc, throughout the document and this should be incorporated into the next draft. It was also noted that stormwater runoff is a primary source of pollutants in our rivers and streams, and while it is referenced in later sections, it should be referenced in this section due to its significant impact on the health of our rivers and watersheds.

Mr. Lefebvre commented that DEM, Grow Smart, and others have programs training local planners on conservation development and low impact design, and requested that these be included in the charts. The document should also include references for guidance on development and redevelopment in more densely populated areas, especially as there is potential for restoration and recovery of impaired habitats.

Mr. Nelson questioned an implementation item on the chart on page 31 referencing gaps in community land use authority; and Mr. Millar affirmed that this is a problem. Mr. Millar also noted that most regulations preclude consideration of cumulative impacts on the environment due to statutory limits. This review of each project as "stand alone" allows for continued degradation because in many instances the negative impact cannot be attributed to one development proposal.

Water Reliant Economy: Mr. Nelson stated that this section seemed quite sparse. There is no information on efforts to return recreational fishing to our rivers, work on habitat restoration, fish ladders, dam removals, etc. Ms. Morrill requested that given the

impact of aquaculture on water quality, that more should be mentioned about land based aquaculture. Mr. Colt stated that that land based saltwater aquaculture has to date not proven to be economically feasible in Rhode Island, although land-based freshwater aquaculture opportunities continue to be explored by local farmers. Furthermore, CRMC and DEM have recently proposed jointly a 5% cap on the amount of acreage to be dedicated to shellfish aquaculture in Rhode Island's salt ponds although shellfish aquaculture acreage in the salt ponds remains considerably below the proposed cap limits. He also noted that efforts by Roger Williams University researchers have clearly demonstrated the commercial potential for the land-based culture of ornamental saltwater species such as clownfish.

In regard to land based agriculture, Mr. Lefebvre said his understanding has been there are about 75 major working farms in Rhode Island and that DEM normally has cited about 700 total farms in Rhode Island which includes so-called boutique farms. He said he noted recently a newspaper article that cited 800+ farms in Rhode Island. He also noted that the agriculture community in Rhode Island is effective at asserting their water rights.

Mr. Baer suggested that water based transportation needs more attention. Mr. Colt stated that water-based transportation for commuters had yet to be demonstrated as economically viable, but agreed with Mr. Baer that there should be a vision for the future development of this transportation alternative.

Natural Hazards: Mr. Nelson requested that more attention be given to freshwater flooding. Ms. Sherman noted that the only agencies references were to CRMC – this section appears to relate to coastal flooding only, whereas DEM has a role in addressing freshwater flooding issues. In addition there should be a mention of climate change and its impact on future flooding. Another issue that should be raised is the condition of the dams and their ability to withstand more frequent intense storm events.

Water Supply: The WRB will be providing significant input into this section. Mr. Nelson requested that attention be given to freshwater issues. Ms. Morrill requested that the document be revised to put Water Quality as the first section. Mr. Colt reviewed the process by which it was determined that Waterfront Development be the first issue addressed. Ms. Sherman noted that stormwater issues are addressed in this section, but more needs to be said in the document about the impact on freshwater systems. She also requested that NBC's CSO project include recognition of the importance of Phase II and Phase III of the project as they address freshwater areas currently impacted by sewage overflows. Ms. Morrill requested inclusion of tertiary sewage treatment plants. Mr. Colt noted that their will be major funding obstacles for WWTF without additional bonding capacity.

Fisheries and Aquaculture: In addition to the extensive comments under Water Reliant Economy, a general observation that this section needs more freshwater fisheries comments, including DEM's annual role in stocking ponds and rivers. Ms. Morrill requested the document include reference to chemical discharges, which affect the lobster population.

Biodiversity: Mr. Baer felt that more should be said about education, emphasizing the need for future generations to have regard for environmental conditions. Mr. Lefebvre

suggested the No Child Left Indoors effort might be mentioned. Mr. Colt commented that the front section of the document might include more about education and making informed decisions.

Ms. Morrill stated that the control of invasives should be an important initiative for the state as it is a broad and pervasive problem throughout the state. Mr. Lefebvre requested that protection of the Scituate Reservoir, a critically important potable water source, be included in the document. He also observed that a chart of state building permits, by year, might be a good graphic documenting the change in land use patterns. Other charts from Land Use 2025 might also illustrate the challenges. Mr. Millar noted that a good indicator of watershed health is the measurement of impervious cover, which can be accomplished through GIS mapping.

Save the Bay's Review and Comments submitted May 30, 2008

Please accept the following Save The Bay's comments on the March draft of the Systems-Level Plan. I hope that you find these comments constructive and helpful in the extraordinary effort that you have been making to bring some structure and focus to an unwieldy group and a "wicked" set of problems.

Jane Austin

The Coordination Team is to be commended for this important effort to develop the Systems-level Plan (SLP) called for by the General Assembly. Rhode Island faces an increasingly dynamic set of management challenges in its effort to protect and restore the state's aquatic resources in a context of ever more intensive human and economic use. Save The Bay is pleased to offer these comments on the March public review draft and looks forward to continuing to work with the Coordination Team and its leader, Ames Colt in its further development and implementation.

Comments by section:

Vision and Goals

Strengths:

The vision and goals are clear, expansive, comprehensive

Suggestions:

Need a lay translation of systems perspectives and ecosystem-based mgmt in introductory vision and goals.

Cultivating a Stewardship Ethic

Strengths:

This section makes an evocative and compelling case for the importance of the SLP.

Challenges we face and how we will meet them

Strengths:

List of challenges very effectively puts goals in a dynamic context.

Suggestions:

Each of fourteen challenges can be linked to one of the first eight issue/goal areas, but they are not presented in a sequence or in groupings that highlight or reinforce that connection. Creating that connection might be helpful.

Infrastructure

Strengths:

Linking the challenges to the resource requirements necessary to address them is an important element of the planning effort.

Climate Change

Strengths:

Discussion of the newly dynamic physical context is important and the write-up illustrates many of the interconnections among the issue areas.

Suggestions:

Put succinct rationale for giving this topic such prominence at front of section.

The RI Bays, Rivers, and Watersheds Coordination Team

Strengths:

Inclusion of key responsibilities of CT
Definition of Ecosystem-based management
Issue focus

Suggestions:

Expand early discussion of “coordination” to emphasize CT role as “Catalyst”.
Include sources of improvement as result of coordination: changes in approach: increases in level of effort, resources allocation, and cooperation; involvement of new actors.
Incorporate examples of past collaboration successes, e.g., habitat restoration team, Providence channel dredging, Blackstone and Taunton coalitions/campaigns, Aquaculture.

Expand Coordination Team description to provide insight into relative capacities and resources. Include chart that identifies org. type, mission/charge, capacities (people, budget, skills). The different strengths and mandates are part of challenge and potential embodied in the CT.

Consolidate and reorder sections outlining CT’s charge, shifting focus to first task and focus of SLP – Identification of Key issue areas.

- Brief description of need to characterize issue areas in ways that capture the political dynamics and conflict
- Issue of scale
- Timeframe
- Guidance from legislation, although list itself is not necessary
- Role of Working Group

Follow with SLP issue areas.

Then include description of next steps, Annual work planning and long-term alignment of SLP and overall agency administration, priority setting and budgeting.

Eliminate Table One on Feedbacks and Figure One on Implied Relationships.

Consolidate and perhaps include as appendix the bulk of the background discussion on planning. It is interesting and relevant but less important for most of the readers than specific information about the CT and its work to date.

- Command and control
- “networked governance”
- Planning Rationality versus Political Rationality

Issue domains

Comprehensive overview and sweep of issues identified is appropriate starting point for this iterative effort.

Suggest that each issue section open with short bulleted list of key points/problems.

See table attached with review comments.

RI Bays, Rivers, and Watersheds Coordination Team - System Level Plan - Issue Area Chart and Recommendations

Issue	Refinements	Linkages	Priorities	Collaboration
Waterfront & Coastal Development	<p>Incorporate climate change focus here rather than Natural Hazards to drive home the need for adaptive management and mitigation</p> <p>Add Ocean SAMP and include Salt Ponds and Coastal areas in geographic focus</p>	Need to guide public and private investment dollars in line with long-term development objectives	SAMPS	Collaboration between CRMC and DEM is extraordinarily important across the board.
Watersheds	<p>Change title to reflect land use focus as well</p> <p>Incorporate Smart Growth principles, training</p>	Incentives for brownfield vs. greenfield investments	Compact growth and green development	Link of growth to water availability EDC role Transit as a driving force
Water Reliant Economy	Support for Weaver Cove too narrow an objective, should be couched in context of West Side Master Plan	Recreation and Tourism returns tightly linked to public investment in clean water infrastructure		
Natural Hazards	<p>Shift broad climate change objective, e.g. Section 145 CRMC to Waterfront section.</p> <p>Consider resilience beyond the (existing) structures. Community resilience tied to land use and zoning as well.</p> <p>Retain focus on episodic aspects and disaster related activities.</p> <p>Retain science and modeling components</p>		<p>LIDAR, modeling</p> <p>Resilience planning</p> <p>Post-storm reconstruction</p>	

Issue	Refinements	Linkages	Priorities	Collaboration
Freshwater Supply	<p>Rework first objective to emphasize infrastructure investment for system reliability, safety, redundancy and reserve capacity. Avoid implication that water is expected to be equally available everywhere.</p> <p>Streamflow standards – Agency action, DEM establishment of withdrawal standards through formal public process</p> <p>Reduce wasteful water use, increase efficiency and conservation – incorporate demand management requirements in enforceable Water Supply System Management Plans (WSSMPs) – WRB resp.</p>		Water withdrawal standards	<p>Resource protection and water allocation are separate but related responsibilities of DEM and WRB. Long-standing tensions in this area have been a key obstacle to the evolution of a comprehensive framework for water supply management in RI.</p> <p>Demand management efforts tied to pricing will require the cooperation of the Public Utilities Commission as well.</p>
Water Quality	<p>Clarify meaning of “distinguishing between direct dischargers and watershed dischargers.” Meaning unclear.</p> <p>Targeting of Portsmouth too narrow for a system level plan, and a broader Aquidneck Island solution should be considered</p>	<p>The linkage between Water Quality issues and Freshwater Supply protections becoming tighter. Both end of the pipe. West Side Master Plan and Naval land re-use in Marine Economy and Coastal Development a potential linkage.</p>	<p>Fulfillment of State mandate re: WWTF nitrogen discharges</p> <p>Increasing importance of Non-point and stormwater sources</p>	<p>RI Clean Water Financing Agency an important partner</p>

Issue	Refinements	Linkages	Priorities	Collaboration
Fisheries and Aquaculture				Working group current example of catalyst.
Biodiversity: Aquatic Habitats and Invasive Species	Increase funding from OSPAR to leverage federal and local efforts	<p>Incorporate Climate change in assessment and planning.</p> <p>Water Quality improvements key driver of restoration potential</p> <p>Waterfront and Coastal development framed as restorative development</p>		
Research and Monitoring	<p>Emphasize access, transparency and timeliness of data</p> <p>Tighten link to problem definition and program evaluation</p> <p>Identify internal agency sources of data such as permitting records for ISDS, well-drilling, test results that can provide early indicators of trend or performance</p>		Indicator system	
Education and Training	More emphasis on land use, incorporate Smart Growth	Hard to overstate importance or pervasiveness of need.	Local training and technical assistance	Development of model ordinances

CRMC General Comments submitted May 27, 2008

- Suggest that some sort of summary of the BRWCT agencies, their jurisdictions, regulatory authority and policy initiatives might be helpful—this would provide a good context in which to view the Objectives / Strategies / Actions tables.
- In general, wording should be more concise. Strong points seem to get diluted in some places. “Buzzwords” such as “proactive” and “synergistic” (used liberally) should be avoided.
- Table One and Figure One are difficult to interpret and seem incomplete.
- Need consistency when referring to state waters. Goes back and forth between “marine and fresh,” “coastal and fresh,” and “salt and fresh.” Would suggest simply referring to the state’s “waters”—where more specific, include “estuarine” in the description.
- Overall structure is ok—move the climate change section from the beginning to somewhere near the Natural Hazards section. Also, there is a brief section on dredging at the end of the waterfront development section that talks about the use of dredged materials for habitat restoration—this should be moved to the habitat restoration section. Dredging might better fit under the Water Reliant Economy section.
- Sections that are simply excerpts of other documents (e.g. Marine Fisheries and Habitat Restoration) should be edited to remove some of the unnecessary detail (too long). See specific changes to document.
- Section formats should be standard for each issue (see document).
- The Agency Actions sections of the issue tables should assign actions to specific agencies (we assume that this hasn’t been completed however).
- Refers to “DEM’s Blueways Program” on page 36. The Blueways Alliance is its own non-profit now, and the program was started by the Rivers Council, with support from DEM.
- Add Conclusions section as well as an Executive Summary.

Comments received from Donald Pryor

Attached are comments on your proposed Systems Level Plan. Though critical, the comments are intended to be constructive and I hope you will find them so. I would encourage you to make all comments public and hope that you consider them seriously before completing this plan.

Following are comments on the draft Systems Level Plan (public comment version of March 2008):

1. General

a. This plan lacks the specificity of actions and the performance measures that were the core of the Governor’s Commission work and the draft systems-level-plan (SLP) previously submitted to the General Assembly. Lacking those, it is a step backwards in planning for RI’s bays, rivers and watersheds.

b. This plan has taken on much of the form of the Marine Resources Development Plan (MRDP). The MRDP, according to the CRMC website, was “designed to guide the fuller use by the CRMC of its authority under Chapter 46-23 of the Rhode Island general laws and under the Federal Coastal Zone Management Act.” The MRDP was developed with deliberate insularity to serve CRMC, not coordination of state agencies with bay, river and watershed responsibilities. There is an element of cognitive dissonance in using that inward-looking plan be a guide for the Coordination Team and a replacement for previous plans. The widely-shared criticism of the plan as excessively oriented toward CRMC is indicative of this weakness.

c. This SLP does not address many of the aspects that state legislation call for it to do (not to mention that it is two years late). For instance, it does not address priorities as required by legislation. Priorities implicit in ordering seem to reflect MRDP organization. The plan should specifically eschew such interpretations.

d. While coordination is a growing rather than shrinking need of state efforts, this plan lacks a clear strategy for coordination and, instead, seems to suggest continuing competition among state agencies and between state and local government bodies.

e. The process of adoption of the systems level plan has not taken full advantage of opportunities to foster collaboration. For instance, the ad-hoc group has not, in general, had the chance to review as a group the proposed elements of the systems-level-plan.

f. There appears to be no provision for or expectation of public sharing of comments. It is unclear what, if any, responses might be made to public comments. Further, the document seems to be changing during the comment process – the current web posting is 86 pages, 5 pages longer than at the beginning of the public comment period.

g. This plan makes many recommendations of the nature of “increase support”, “invest in” and “fund”. Current economic conditions make such recommendations unlikely to be carried out. Perhaps the plan should focus on the highest priority, pressing items and be creative in proposing how to address them.

2. Waterfront and Coastal Development

a. Much of this section is oriented toward special interests, particularly industrial waterfront, rather than broader public interests. No economic or social value is explicitly presented as a rationale for this special interest consideration. By listing this section first in the plan, an impression that this is the highest priority is created. If so, priorities have changed significantly since the previous planning efforts including that of the Governor’s Commission and a rationale should be provided.

b. The objective of imposition of “design standards” is questionable. The plan should be more specific in defining objectives and strategies should follow. It is not appropriate to list Special Area Management Plans (SAMPs) as strategies. In most cases, the scope and goals of SAMPs have not been defined. The meanings of “complete and implement” are undefined. While SAMPs have been able to capture additional federal funds, they have not been demonstrated to achieve success by any metric

3. Watershed

a. Improving cooperation with the state of Massachusetts should be a high priority since more than half of Narragansett Bay’s watershed lies there.

b. Stormwater management is listed as one of 4 objectives. The new Stormwater Management Manual is a major tool to improve management but has been long delayed and is not even mentioned in this section. The manual should be completed. New efforts to address stormwater or related issues should not compete with its completion.

b. The hypothesis of headwaters vulnerability is worth analysis – but should not be assumed as on p. 26.

4. Natural Hazards

a. Although the text recognizes that inland flooding and other non-coastal hazards present significant challenges in the watershed, all the actions described are for CRMC.

5. Water Quality

a. Nothing is included on fresh water quality.

b. The “Conclusions and Outstanding Issues” section is jarringly unintegrated. As written, it suggests a basic lack of coordination. Where appropriate, these issues should be developed further and incorporated into the text. (Why would WWTFs be treating greater stormwater inputs? Is this specific to NBC and other CSO plants or a more general phenomenon?)

c. No mention of Phase II of NBC CSO or Fall River CSO or Newport CSO.

d. Little mention of state(s) revolving funds and state and federal contributions. Recent needs assessments (MA and RI) should be described. New federal trust fund proposals deserve mention. State bond proposals should be listed as actions.

d. In the first strategy box, recognize that nutrient controls are needed at Blackstone and Ten Mile River watershed WWTFs.

6. Fisheries and Aquaculture

a. Almost all of this section is 3 or more years out of date. The section does not present a current picture nor propose a plan.

b. Nothing is included on freshwater fisheries.

7. Biodiversity

a. Nothing is included on freshwater wetlands.

b. Under aquatic invasive species, actions should be more specific than “receive and administer federal grants.” To be effective, action will need to address both marine and freshwater and participation of state agencies besides CRMC is needed.

b. Proposals in response to the critical fish habitat charge made to Governor’s Commission have apparently been dropped.

8. Research and Monitoring

a. The plan largely avoids mention of research. The goal to “collect, analyze and communicate data and knowledge” does not include research – research is a process to

develop knowledge, not merely collect it. Identification of research needs and priorities is a specific mandate of the legislation establishing the coordination team. The legislation called for a scientific advisory committee (SAC) to be established to advise the coordination team on research priorities, technical matters, and best management practices. The SAC proposed to develop research priorities for this plan but its proposal was not supported.

b. Improving monitoring (not communication or education about monitoring, but actual monitoring itself) has been a major focus of efforts since the formation of the Governor's Commission. However, no objective or strategy in this plan addresses that perceived need. Has it been met or is there some other reason for its omission?

Comments received from G. Gerritt, April 29, 2008

Defense industry. Issues, but may be beyond the scope of this. pg 18

Growth and prosperity

Climate change and upgrading roads. Can the contradiction be acknowledged?

pg 20 lots of development that is going to have to be retrofitted for climate change. statement of fact

pg 21 design standards ought to include seal level rise. probably do based on other stuff, but maybe say it here too.

pg 22-23 on why we have been unable to stop sprawl leaves out the powerful economic interests and their lobby's working hard to prevent good policy. And overwhelm it when it is implemented. And the good ole boys network of development. And the american obsession with growth in a world in which growth is killing us.

pg 28 it would be interesting to discuss why local authorities are so reluctant to actually protect land by directing development and enforcing regulations.

Why the lack of a clear mandate???

pg 30 question growth.

pg 36 geo tourism ought to have a reference to Blackstone Valley Tourism Council's work on this