| Action Plan | Public Comment Document Section | Final Draft Document Section | Comment | Reviewing Organization | NBEP Response |
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| Introduction | Preface | Preface | The NBEP has an important role to play in being a scientific resource that maintains a strong understanding of environmental conditions in the Bay and region including tracking new insights gained by researchers and others. This statement at the start of the 2nd paragraph and following text don't adequately acknowledge or reinforce this role. DEM recommends adding a sentence that reflects the foundational role science plays in the program and then go on to speak to patrnership driven activities. There are opportunities later in the document to reinforce this point as well. | RI DEM Office of Water | We have emphasized NBEP's role in science where appropriate throughout the document. |
| Introduction | Preface | Preface | Move the period at the end of the first sentence inside the quotation marks. | Blackstone Watershed Collaborative | Edited. |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | Line 2, 6, 36, 37: It is inappropriate/inaccurate to refer to the coastal salt ponds as a singular watershed. This area is not one watershed but rather several watersheds. Revise the text to delete references to there being three watersheds or change text to refer to sub-regions. Use the plural when referring to the coastal ponds watersheds. | RI DEM Office of Water | Revised text to clarify. |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | Line 22-25: The watershed descriptions could be improved by providing more content comparable to the Habitat Section. It woud be appropriate to cite more facts about the unique characteristics of the three sub-regions and (what the public cares about), what the major stressors, what we know about water quailty and habitat in the sub-regions. This provides a foundation for the following discussion. The paragraph on Narragansett Bay should also make clearer that while there has been progress, portions of the Bay still suffer from poor water quaity. It currently ends sounding like the problems have been largely solved. | RI DEM Office of Water | Detail has been added to watershed descriptions. |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | Line 33: Replace "Typically" with prohibited. "Typically" indicates this area is some times not prohibited shellfishing waters, which is problematic for enforcement | RI DEM Office of Water | Replaced "typically restricted" with "prohibited." |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | Line 65-66: There are closed shellfish areas in the the coastal pond region. Limit this to referring to access and salt marshes. | RI DEM Office of Water | Removed reference to shellfishing areas. |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | In the Narragansett Bay Watershed paragraph, Worcester is mentioned twice in the sentence beginning "These impacts are felt…" | Blackstone Watershed Collaborative | Second reference to Worcester removed. |
| Introduction | About the Narragansett Bay Region | About the Narragansett Bay Region | Consider moving Figure 2 to its own page prior to the About the Narragansett Bay Region section. | Blackstone Watershed Collaborative | Figure moved as suggested. |
| Introduction | NBEP's Services | NBEP's Services | Will these projects all be hyperlinked? | Blackstone Watershed Collaborative | Yes, the final design of the document will contain hyperlinks. |
| Introduction | About NBEP | About NBEP | Line 106 and elsewhere: Given the use of the word "we" can be misconstrued in a multi-faceted program like the NBEP, DEM recommends referring to the program instead: example - the NBEP has intentionally…. It's important to keep roles clear and distinguish when talking about actions by the NBEP Program staff, actions by NBEP and specific partners, or NBEP collective of all parterns. DEM also suggests NBEP indicate that you are building on a science foundation in the first paragraph. address this distinction throughout | RI DEM Office of Water | Converted to consistent third-person voice throughout document. |
| Introduction | About NBEP | About NBEP | Line 147 and elsewhere: Clarify the use of the word communities. What does the word communities mean? Municipalities? Later in the document the words "conservation communities" is used. Where the document uses communities, consider adding an adjective to clarify; e.g. scientific community, local communities, conservation communities, etc. address this distinction throughout | RI DEM Office of Water | Clarified use of "community" throughout document. |
| Introduction | About NBEP | About NBEP | Line 234: It would be appropriate to mention here that BIL and SNEP funds have fostered the NBEP capacity to serve that funder role but are of limited duration | RI DEM Office of Water | Addressed future cessation of IIJA funds in text. |

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| Introduction | About NBEP | About NBEP | Line 210: Is 2025 the correct date for adoption of the WQ Dashboard by the Blackstone and Salt Ponds Coalitions? | EPA Region 1 | Yes. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 291-297: How was scientific understanding brought to bear in this process? Can you say something aboout ensuring the actions are scientifically/ technically sound? | RI DEM Office of Water | NBEP added language about how CCMP Actions respond to priority issues and data gaps identified in the 2017 State of Narragansett Bay and Its Watershed Report. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 304-306: Suggested revision for clarity: "Several multiple interstate watershed groups focused on the Taunton, Blackstone, and Wood-Pawcatuck have gained strength. As worded it can misconstrued that there are multiple groups in each watershed. | RI DEM Office of Water | Edits made as suggested. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 337-342: It would improve content to cite the rough amount distributed as of a certain date | RI DEM Office of Water | Totals added for MVP and MRP programs. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 342: insert "priority" before the word projects at the end of the paragraph | RI DEM Office of Water | Edited. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 360: This section would be strengthened by being clearer about the types of EJ concerns that align with NBEP. Suggest giving some examples: public access, green spaces, stormwater/flooding mgt., etc. | RI DEM Office of Water | This section has been revised. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: Wording of the Public Spaces vision is awkward. Consider revising by removing the word "quality" and replace with wording like " Safe, well maintained…" if that is the intent regarding access. | RI DEM Office of Water | Revised Public Spaces vision to remove "quality." |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: People Objective 2: Is it intentional to limit the use of information to setting and tracking targets? Presuming that is not the case, reword to also reference support effective management. | RI DEM Office of Water | Modified People Objective 2 to "Fill knowledge gaps and improve access to and use of information to improve ecosystem management and public understanding." |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: Water Quality Improvement Goal: For consistency of wording, revise to "Improve water quality to support healthy ecosystems and communities." | RI DEM Office of Water | Revised according to suggestion. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: Water Quality Improvement: Consider separating monitoring to be its own action: Ensure robust water monitoring programs provide the information needed for effective management decision-making and adaptation to climate change. This is vital to water quality management and the draft CCMP doesn't reflect some of the pressures on the monitoring networks that have been relied on. It's somewhat awkward to have the action buried in a section on "People Ready to Act" and you could consider narrowing the focus and putting in under WATER. Additonal comments on monitoring forthcoming. | RI DEM Office of Water | Ecosystem monitoring and modeling have been separated into three actions: Ecosystem Modeling and Decision-Support Tools, Habitat Monitoring, and Water Quality Monitoring. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: Water Quality Improvement: Consider adding another Objective to WATER. Increase the number of watershed-based plans guiding actions to protect and restore coastal waters across the NBEP Region. | RI DEM Office of Water | An Action for Land Use and Watershed Planning has been added in the Water Quality Improvement Action Plan. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 371: Habitat Protection and Restoration Objective 3: The wording of this objective referencing land use decisions does not appear to be well aligned with the actions. Land use decision-making is an important topic, but it encompasses much more than aspects related to open space. The objective should be revised to reflect the focus on open space. | RI DEM Office of Water | This objective has been removed. Open space and land use planning considerations have been incorporated into other actions in Water, Habitat, and Public Access Action Plans. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 401: Action Plan Brief: include the year-dollars for which costs were estimated (presumably 2024) | RI DEM Office of Water | Clarified that costs were estimated in 2024 dollars. |
| Introduction | About the CCMP Vision and Strategy | About the CCMP Vision and Strategy | Line 412: Insert "NBEP" in front of overarching guidance for clarity | RI DEM Office of Water | Clarified that these are NBEP guidance documents. |
| Introduction | Strategic Lenses for Action | Strategic Lenses for Action | Highlighted sentence "Habitat connectivity is a prime focus area for NBEP over the next ten years." Comment: I like this clear sentence - could you do more of those "this is important" and bold them maybe? | Blackstone Watershed Collaborative | NBEP will work with the document's art director to emphasize text. |
| Introduction | Strategic Lenses for Action | Strategic Lenses for Action | Spell out Mass ECAN if this is the first time using the acronym. Also note that Mass ECAN now has a dam removal working group. | Blackstone Watershed Collaborative | Full organization name spelled out. |
| Introduction | CCMP Framework for Action | CCMP Framework for Action | Remove line numbers. | MassDEP | Done. |
| Introduction | CCMP Framework for Action | CCMP Framework for Action | Is there a visual that shows the overall hierarchy of all the goals/action plans/objectives/actions at a glance, even if just titles? | Blackstone Watershed Collaborative | This visual will be developed during final document design. |
| Introduction | Anatomy of an Action Brief | Anatomy of an Action Brief | Consider bolding each of the Action Brief sections. | Blackstone Watershed Collaborative | Edited as suggested. |

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| Introduction | Anatomy of an Action Brief | Anatomy of an Action Brief | Highlighted $10k-$500k cost category with comment: are these just examples? There are certainly individual actions for partners that are under $500k, such as outreach grants? | Blackstone Watershed Collaborative | Added "capacity-building and outreach grants" to examples listed for the $10-500K category. |
| People | Introduction | Introduction | Highlighted Action Plan title: bold or italic or different font or different line, or use : or something to differentiate the title from "action plan." Also, it would be helpful to have a header on each of these headers with a sort of "where are you" - goal, action plan, objective, actions with an arrow or circle to get your bearings? | Blackstone Watershed Collaborative | NBEP will work with an art director to emphasize text and create graphics to help orient the reader. |
| People | Introduction | Introduction | In first paragraph, add a colon after "objectives" in the sentence beginning "NBEP fulfills its roles by…" | Blackstone Watershed Collaborative | Instead of a colon, changed "addressing" to "to address" to clarify the sentence. |
| People | Introduction | Introduction | In Public Engagement callout box: add that the Blackstone Watershed Collaborative "has to date leveraged over $1M in other funding sources to continue its operation and support of small organizations" and "has provided over a dozen subawards to partners totaling over $800k." | Blackstone Watershed Collaborative | Added text. |
| People | Introduction | Introduction | Line 441: Clarify use of "community". Perhaps use "stakeholders and partners" instead for clarity. | RI DEM Office of Water | Use of the word "community" has been clarified throughout the document. |
| People | Introduction | Introduction | Line 460: Sentence appears to be missing a word "will effort".. | RI DEM Office of Water | Sentence deleted in final draft. |
| People | Introduction | Introduction | Line 467: insert "information on " in front of environmental status and trends. | RI DEM Office of Water | Inserted "information about" in text. |
| People | Introduction | Introduction | Line 468: " translate complex science for the public… | RI DEM Office of Water | "Narrative stories, GIS StoryMaps, and digestible fact sheets also translate complex science topics for broad readership and encourage further inquiry." |
| People | Introduction | Introduction | Line 470-472: Suggest keeping the last part of the sentence broad. ..Information provided …and others to better understand the stressors affecting ecosystems health, identify how environmental conditions are changing and impacting communities and thereby build public support for action. In addition, the information can inform management decisions-making including strategic investment in protection and restoration. | RI DEM Office of Water | Revised this section in final draft. |
| People | Introduction | Introduction | Line 474: DEM is suggesting that Information and Tracking Objective focus on how information can be used for engagement and decision-making and that monitoring is addressed more thoroughly under other sections and/or actions. DEM will provide more explanation of this comment. | RI DEM Office of Water | This section was edited to reflect moving monitoring to its own Action. |
| People | Introduction | Introduction | Line 474: Suggested edit: A core component of the NBEP is tracking and reporting on the status and trends concerning the ecological conditions in NBEP region. Research, data synthesis and modeling are tools that can contribute the process and assist in setting targets that equate with desired environmental and socioeconomic states. ( Note: Intent here is that monitoring is covered elsewhere). | RI DEM Office of Water | This section was edited to reflect moving monitoring to its own Action. |
| People | Introduction | Introduction | Line 480: Add "and foster ". | RI DEM Office of Water | Edited. |
| People | Introduction | Introduction | Lines 490-496: This concept needs to be better explained to the reader. This is also not just all about status and trends. Applied models typically focus on answering key management questions whether they be oriented to water quality, ecological/food chain dynamics, nutrient cycling etc. There has been significant past investment in attempts to develop water quality (DEM, EPA, NBC ) or ecosystem modeling (EPA, NOAA, URI-GSO) tools for Narragansett Bay but many had significant limitations with respect to their utility to management decision-making. Will need more context in the action write-up. | RI DEM Office of Water | This paragraph has been edited to acknowledge needs for models for decision-making and understanding complex interactions. |
| People | Introduction | Introduction | Lines 497-502: While there are 24 indicator categories, consensus metrics for all of these were not developed in the 2017 report. It was acknowledged that further work to refine how to best measure the indicators in a technically sound manner was needed. Data limitations also existed and continue to this day. I would clarify this paragraph to say further work is needed to refine and improve the metrics of the existing indicators and that over time it may be necessary to develop new indicators to address priority management issues that may arise. | RI DEM Office of Water | The paragraph has been edited to acknowledge the refinement and improvement needed for existing indicators. |
| People | Introduction | Introduction | Line 534: You may want to temper the reference to federal funding given expected changes occurring on the federal level. Still okay to say we want stakeholder to take advantage of the opportunities the will exist. | RI DEM Office of Water | Edited. |

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| People | Introduction | Introduction | Line 541: This sentence needs to be revised. It does not reflect how the Clean Water Act mandated water quality standards are applied in regulatory programs. While DEM does not object to a process for building consensus on some targets that may provide a way to better track partial progress toward long-term water quality goals, such targets would not be the basis of developing a permit. Revise to focus on a framework for tracking progress on short-term goals and collaborating with state management programs and other partners to foster collection of data that support tracking on on a regular frequency. | RI DEM Office of Water | Paragraph edited to clarify intent of target-setting action. |
| People | Introduction | Introduction | Line 547: revise to say "Building capacity within the region" as opposed to saying regional capacity which can be interpreted to be only those working on a regional scale; e.g. SNEP. | RI DEM Office of Water | Edited. |
| People | Introduction | Introduction | Science Communication Action: revise to: …to inform and engage people of estuary and watershed status and trends and be responsive to local and state needs to foster effective resource management. | RI DEM Office of Water | Action edited. |
| People | Introduction | Introduction | Ecosystem Monitoring Action: Suggested edit: Develop and refine metrics and update…. | RI DEM Office of Water | This Action has been significantly modified. |
| People | Introduction | Introduction | Finance Plan Action: What's the intended scope of this document? There are processes already in place that govern the disbursemetn of funds through programs such as SRF programs. Is guide the correct word? Perhaps foster or catalyze are better choices. | RI DEM Office of Water | Edited action to use the verb "catalyze." |
| People | Introduction | Introduction | Page 25 (Governance Highlight box):<br>- Thanks for the shout-out!<br>- Should be Massachusetts Division of Ecological Restoration, not Department (we are a division within the Department of Fish and Game) and please use "MA DER" for our acronym<br>- Could you replace the logo with the attached updated logo?<br>- Update the project numbers sentence to "more than 160 restoration projects, with over 80 active projects currently underway." | Massachusetts Division of Ecological Restoration | Edited. |
| People | Engagement Plan Action | Engagement Plan Action | Line 561: The CCMP would be clearer if you outlined the expected "priority environmental issues" that would be the focus of the engagement plan. | RI DEM Office of Water | Edited action to focus on engagement that will implement the CCMP (rather than "address priority environmental issues"). |
| People | Engagement Plan Action | Engagement Plan Action | Line 574: A bit more more explanation here of how the plan will support aligning and coordinating efforts is needed would improve the plan. | RI DEM Office of Water | Edited. |
| People | Engagement Plan Action | Engagement Plan Action | Line 580: Delete "and artificially" Not needed and confusing. | RI DEM Office of Water | Edited. |
| People | Engagement Plan Action | Engagement Plan Action | Line 597-99: Steer clear of referencing advocacy directly. Use other terms such as "work towards" "build support for "..etc. Given that there are several structures in place that convene stakeholders around climate issues, how is what NBEP proposing value added? What can you say to not appear to be duplicative of existing efforts on convening? | RI DEM Office of Water | This section has been removed from the final draft. |
| People | Engagement Plan Action | Engagement Plan Action | Line 622: add other NGOs and user groups. Add to partners - Lots of folks carrying out education are not on the Steering Committee | RI DEM Office of Water | Added "other agencies and non-governmental organizations" to partners. |
| People | Engagement Plan Action | Engagement Plan Action | Line 629: If you are really reflecting the effort of all partners , this estimate is too low for the ten year period. Bump it up to next category. | RI DEM Office of Water | Edited to clarify that the cost reflects only NBEP staff time to develop the Engagement Plan plus annual RFPs for education and outreach activities. |
| People | Engagement Plan Action | Engagement Plan Action | Line 638: Should include DEM Nonpoint Source Plan which discusses outreach for specific topics. I suspect the same would be true of MA DEP. | RI DEM Office of Water | Added links to RI and MA Nonpoint Source Management Plans. |
| People | Engagement Plan Action | Engagement Plan Action | Community Engagement Broader Outreach: The plan emphasizes engagement but could include specific strategies and be explicit about which underserved or underrepresented communities. | Save The Bay | The NBEP Engagement Plan will specify NBEP's outreach strategy to target audiences. |
| People | Engagement Plan Action | Engagement Plan Action | Regional Collaboration Private Sector Engagement: Strategies for involving businesses in environmental stewardship, such as incentives for sustainable practices or funding contributions. | Save The Bay | The NBEP Engagement Plan will specify NBEP's outreach strategy to target audiences. |
| People | Engagement Plan Action | Engagement Plan Action | Plain Language suggestion: Create a plan to help communities get involved in protecting the environment and to ensure everyone’s voice is heard. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Engagement Plan Action | Engagement Plan Action | Under Potential Projects, change "Nonpoint Source Pollution Plans" to "Nonpoint Source Pollution Management Plans" | MassDEP | Done. |
| People | Research Plan Action | Research Plan Action | Line 731: Further develop metrics and update … | RI DEM Office of Water | Edited. |

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| People | Research Plan Action | Research Plan Action | Line 740: re-word to say initial focus on Providence-Seekonk Rivers, which continue to exhibit water quality concerns including low dissolved oxygen and elevated pathogens. Then say over next ten years as resources allow NBEP will expand the urban research collaboration into Fall River and the Westerly-Stonington area. | RI DEM Office of Water | This paragraph was clarified to highlight the order of the collaborations as time and funding allows. |
| People | Research Plan Action | Research Plan Action | Line 755: Add to projects: Compile and improve sharing of information on planned and completed research related to the NBEP region. ( Comment intended to give emphasis to the core science function of NBEP.) | RI DEM Office of Water | Added project. |
| People | Research Plan Action | Research Plan Action | Line 769: Prioritized research needs are specified for NBEP region and help align research activities. | RI DEM Office of Water | Outcome has been edited. |
| People | Research Plan Action | Research Plan Action | Line 777: and " and other researchers from management agencies, NGOs and academia | RI DEM Office of Water | added "and other researchers from management agencies, NGOs, and academia" to partners. |
| People | Research Plan Action | Research Plan Action | Line 783: Over ten years the collective cost of research is certainly much higher for all activity. Are you limited this to the urban collaboration? Even if that is your intent, costs would be higher. | RI DEM Office of Water | Increased cost category and included additional potential funding partners. Original cost category assumed only NBEP 320 funds. |
| People | Research Plan Action | Research Plan Action | Line 727: research and provide coordianton support to new research… Using coordinate seems to imply a greater level of control than DEM expects the NBEP to typically exercise. This comment is about managing expectations. Clarification is also needed to make clear the role the SAC is advising the NBEP across a broad range of science topics. It should be mentioned that the SAC will be prioritizing topics for NBEP investment and assisting in identifying key gaps in data collection. It also assists in the updates and compilation of required status and trends reports. Then introduce the new Urban Coastal watershed initiative a new areas of focus (but with the reader understanding it's not the sole focus of the committee.) | RI DEM Office of Water | This paragraph was edited to improve clarity and highlight the involvement of the Science Advisory Committee. |
| People | Research Plan Action | Research Plan Action | Plain Language suggestion: Organize research to better understand environmental issues and find solutions. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 647: Recommend revising/reorganizing a bit. As noted above, the need for decision support tools is not limited to simply status and trends. It should reference supporting effective management (or decision-making.) NBEP needs to speak to the varying needs for such tools (or alternatively restrict this section to creating tools targeting the interested public and address management decision-support tools separately perhaps under 2.1.) State managers, researchers and other stakeholders routinely review scientific literature in their work. Decision-support tools for this group may include complex models etc. that are not intended for the lay person to use. That said, there is also a need - as stated in the CCMP - to translate complex data for the less technical audiences and potential users. The action should be aimed at improving scientific understanding across the different levels of users of information by using communication tools and enhancing access to data. It's okay that there are different kinds of needs. Change start of third paragraph to not focus on it being challenging but just acknowledging different needs. Then go on to say the data visualizations and dashboards provide tools that can have board user interest. | RI DEM Office of Water | This action was redefined to be specific for improving understanding across different levels of users and enhance access to data. Decision-support tools for more technical needs were included in the Ecosystem Modeling and Decision-Support Tool action. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 664: insert edits: scientific community, track insights gained from research and synthesize… | RI DEM Office of Water | Sentence edited to reflect the suggestion. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 668: This should again be worded to convey the intent is not to duplicate existing tools and platforms but integrate and or build on those to meet needs in the NBEP region. | RI DEM Office of Water | Sentence edited to reflect the suggestion. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 686: Needs thought on how best to proceed. A data portal was created years ago and withered on the vine. Some state/federal programs require reporting of funding of habitat projects in GIS, like: TRACS https://wsfrtraining.fws.gov/mod/page/view.php?id=215&forceview=1, GRTS https://www.epa.gov/nps/grants-reporting-and-tracking-system-grts Building a tool to integrate several already available data sources is a better way to go rather than create a database (e.g. How's My Waterway pulls from ATTAINS, GRTS, ECHO, WQX, etc.) | RI DEM Office of Water | NBEP appreciates these thoughts and will investigate ways to pull information from existing data sources when building tools. MarshMap was built upon request from salt marsh restoration practitioners that saw a need for such a tool to coordinate restoration work across the region. |

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| People | Science Communication Tools Action | Science Communication Tools Action | Line 670: There should be acknowledgment of the many data visualization tools that are available relative to climate change. Need to not sound like you would be duplicating such effort. | RI DEM Office of Water | This sentence has been deleted. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 711: cost estimate too low for the full ten years | RI DEM Office of Water | Increased cost estimate to $1M-$5M. |
| People | Science Communication Tools Action | Science Communication Tools Action | Line 717: Example: existing Narragansett Bay data Explorer at Brown https://data-explorer.riddc.brown.edu/ , various climate change sites | RI DEM Office of Water | Added link to Narragansett Bay Data Explorer. |
| People | Science Communication Tools Action | Science Communication Tools Action | Can also mention NBEP as the current host for historic and current plans and documents - your research hub is a wonderful, free source of invaluable, easily-searched data! | Blackstone Watershed Collaborative | Added sentence "NBEP also hosts current and past plans, documents, and datasets in its website's Resource Library and GIS Data Hub." |
| People | Science Communication Tools Action | Science Communication Tools Action | Example of a Dashboard to add to Related Resrouces: https://www.waterboards.ca.gov/centralcoast/water_issues/programs/tmdl/report-cards.html | EPA Region 1 | California TMDL Report Card Dashboard added to People-2.1 Related Resources. |
| People | Science Communication Tools Action | Science Communication Tools Action | Accessibility and Transparency Public-Friendly Reporting: Commit to sharing regular progress updates in plain language for broader public understanding. | Save The Bay | NBEP is committed to sharing information in a variety of formats for various audiences, as addressed in the Engagement Plan and Science Communication Tools Actions. |
| People | Science Communication Tools Action | Science Communication Tools Action | Plain Language suggestion: Develop easy-to-use tools like charts and maps to share environmental data with the public. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 789: Water quality monitoring issues are so integral to pollution control activities OWR is suggesting they need to be highlighted in an action under Water Quality. Otherwise, the content that should be part of the CCMP is not adequately covered in this section. While these topics are cross-cutting, the discussion under "People Ready to Act" doesn't really align neatly with the issues related to monitoring activities, but rather is very focused on the compilation of data once collected, improved data management and development of tools and using it to foster action. It could make sense to reflect the data collection activities in the programmatic topics of water and habitat - which is where they more closely aligned. Alternatively, the content here needs to be expanded and properly cross-referenced to Water and Habitat. Additonal comment to explain forthcoming. | RI DEM Office of Water | NBEP will create two separate monitoring actions: Water Quality Monitoring (Water chapter) and Habitat Monitoring (Habitat chapter) to elevate this important issue. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 790: Is the intent to only talk about ecosystem monitoring and modeling only? This section need better context, content and re-organization of monitoring remains in the discussion. What do you mean by integrated ecosystem modeling versus water quality modeling used in management? Regarding modeling, there have been several significant attempts at both water quality and ecological response modeling for Narragansett Bay with - frankly - limited success in producing a tool that has meaningful application in water quality management. This past history needs to be acknowledged and a first appropriate step would be a project to convene the informed stakeholders involved in modeling and complete an assessment of the various model applications and limitations with the support of a unbiased expert. Past investments have involved millions and I caution the NBEP about suggesting it will have the resources to support development of a calibrated bay model. It would constitute progress to complete an assessment and build consensus around a preferred path to further work to develop a water quality model for Narragansett Bay. Other models aimed at ecological responses are also complex and a focus of continuing research including understanding response to climate change. | RI DEM Office of Water | This Action has been split into two (Modeling and Water Quality Monitoring) to allow more space for context and clarification of NBEP's intended roles in each Action. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 794: add "since at least the 1950s" | RI DEM Office of Water | Edited. |

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| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 796-800: Following the second sentence, from the RI perspective on water quality, the majority of ambient water quality data used in water quality management is collected by either the state programs, under state-funded agreements with USGS, NOAA and URI, or various regulated dischargers. This includes URI-WW which has maintained a contract with DEM-OWR for decades. The research community conducts a limited number of long-term datasets. It appears misleading to suggest all these groups are collaborating to establish common indicators and then delivering the data to resource managers (for water quality that being the state- DEM). A better description of the collective monitoring activities, the known nature of key gaps, the vulnerability of existing programs to disruption due to lack of resources would provide a stronger context for proposed potential projects related to monitoring. | RI DEM Office of Water | Comment addressed in new water quality monitoring action. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 801-807: 'Add a note that while a calibrated baywide water quality model has not yet been fully developed, models of varying complexity have been developed at smaller scales and successfully used to support TMDL development and permitting. Edit: Existing models have also highlighted gaps in current monitoring activities that remain needs with respect to improving the robustness and accuracy of model predictions and related outputs. | RI DEM Office of Water | Note added to Action. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 808-812: 'This activity should be closely coordinated with RI Environmental Monitoring Collaborative to avoid duplication of efforts or made clearly distinct; e.g. convening topic specific workgroups. There should perhaps be discussion of assessing and identifying over time the database/data management needs relative to datasets of interest to the NBEP indicators. These systems are constantly evolving. | RI DEM Office of Water | Comment addressed in new water quality monitoring action. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 813-817: 'This is another area where context and history is appropriate. There have been multiple efforts to create a central database clearinghouse of bay related data that proven difficult to sustain. CCMP needs to be clear on what the proposed tool is intended to do. (connect people to data sources managed elsewhere versus a central database.) It would be appropriate for the CCMP to forecast a need to assess the status of data collection to support indicator reporting and plan for incremental improvements to the management of and access to datasets of interest. Where does the Brown U. bay "data portal" fit into what's envisioned in the CCMP? | RI DEM Office of Water | Comment addressed in new water quality monitoring action. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 821-827: Needs a better description of the existing watershed models and on-going work to develop models to avoid again perception of duplication of efforts. If not duplicative, then better description of how any NBEP investments in modeling will add value should be explained. With SNEP funding, RIDEM, CTDEEP and EPA-ORD are developing a WASP model for Little Narragansett Bay (almost complete) which is expected to lead to TMDL development. RIDEM is also working with EPA-ORD on NB WASP model in the future. Need to clearer that NBEP will not duplicate such efforts but may become a partner to advance the work as needed. | RI DEM Office of Water | NBEP's role has been clarified. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 847-848: Change project to: Convene stakeholders and other experts to review available modeling tools and their limitations and build consensus on pathways for development of a validated and calibrated bay water quality and ecosystem models to support management and assist in setting CCMP targets. | RI DEM Office of Water | Edited |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 849: Edit: Support innovations in monitoring strategies that bring efficiencies to and build capacity for data collection and encourage community citizen science programs that help fill priority data gaps. Community (volunteer) monitoring is well established practice that DEM would not automatically characterize as "innovative". | RI DEM Office of Water | Edited |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 851: Output - consider adding "Broader understanding of the available modeling tools and their applicability to resource management" as an output. | RI DEM Office of Water | Added as an outcome |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 875: This cost estimate is significantly low. | RI DEM Office of Water | The estimate was edited to reflect more accurate costs. |

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| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Line 890: Add link to Narragansett Bay Data Portal in the resources | RI DEM Office of Water | Link to the portal was added to Related Resources. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Mention and hyperlink StormTools as a model that RIDEM uses to inform policy actions. | Blackstone Watershed Collaborative | NBEP will add StormTools to the list of Related Resources published with the online version of the CCMP. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Action Description: Has any of the biological data been successfully integrated into any of the predictive modeling efforts? One framing of the modeling/data connection is that data is being collected to constrain model uncertainty. Identifying where the uncertainty is in the system could be a role of the NEP. Is it spatial uncertainty, uncertainty in certain pollutant ranges, system response to changing meteorological conditions, etc.? This section could also benefit from clearer framing of what the models are actually addressing. Right now this section reads very generally without explicitly identifying the sources of uncertainty that data collection and modelling are aimed at remedying. | EPA Region 1 | Acknowledged with appreciation. NBEP has significantly modified the text of this Action for better clarity. However, discussion of model specifics will be better suited to another document; ideally, such a discussion would be part of the proposed project to convene stakeholders to review available models and their limitations. |
| People | Ecosystem Monitoring and Modeling Action | Ecosystem Modeling and Decision-Support Tools Action | Plain Language suggestion: Improve methods to keep track of how the environment is doing and predict future changes. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Indicators Action | Indicators Action | Line 894: Reword action to not be repetitive. | RI DEM Office of Water | Action has been revised to: "Develop and update indicators to track environmental and socioeconomic trends." |
| People | Indicators Action | Indicators Action | Line 900: insert "water quality" after climate change | RI DEM Office of Water | Edited. |
| People | Indicators Action | Indicators Action | Line 904: In this paragraph, it would be appropriate to more clearly reflect the fact that while there was consensus on 24 indicators, there remained a need to develop or refine metrics for a number of them. You should also note that as the regional SNEP Program has continued to develop, there is a need to coordinate and ideally align indicator or target development to ensure program efficiency and promote consistent messaging about environmental conditions. | RI DEM Office of Water | The paragraph was edited to reflect the need for further indicator refinement and partnerships with SNEP. |
| People | Indicators Action | Indicators Action | Line 920: Add a reference to how the science committee and research plan will contribute to these activities. | RI DEM Office of Water | The sentence has been edited to reflect the guidance of the Research Plan, Science Advisory Committee, and topical work groups. |
| People | Indicators Action | Indicators Action | Line 935: Develop refined metrics, assess and update existing indicators and create new… | RI DEM Office of Water | Potential project edited to reflect the suggested text |
| People | Indicators Action | Indicators Action | Line 955: Add "Other researchers" to partners | RI DEM Office of Water | "Other researchers" have been added. |
| People | Indicators Action | Indicators Action | Potential Projects: Potential worry with the list of indicators ballooning. Should indicators be constrained down to those that the NEP has ability to address? | EPA Region 1 | The action and project have been reworded. |
| People | Indicators Action | Indicators Action | Plain Language suggestion: Develop clear measurements to show progress on environmental and social improvements. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Indicators Action | Indicators Action | Socioeconomic Impact: Explore how actions affect local economies and communities, such as job creation through restoration projects or tourism enhancements. | Save The Bay | The action and project have been reworded. |
| People | Finance Plan Action | Finance Plan Action | Line 1218: This seems to refer to on-the -ground implementation projects. Assuming that is the case, then I think you should indicate that governmental and non-governmental entities need funding support to plan, design and implement projects of variable scale and complexity. (DEM doesn't envision for such projects you would be directly funding an individual? Consultant yes, individual person - probably not) | RI DEM Office of Water | Text has been revised. |
| People | Finance Plan Action | Finance Plan Action | Line 1212: The challenges with pollution are not just legacy related. | RI DEM Office of Water | Sentence has been edited. |
| People | Finance Plan Action | Finance Plan Action | Line 1222: Change to reflect that there has been recent years of significant new federal funding available that has spurred investment…but add something along the lines of acknowledging there may be changes occurring in the availablility of federal funds, and that it is still important to be positioned to take advantage of the future opportunities. | RI DEM Office of Water | Action has been modified to acknowledge the benefits of recent increases to federal funding while acknowledging their short duration. |

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| People | Finance Plan Action | Finance Plan Action | Line 1228: It's not clear what the scope of the finance plan is in the paragraph. Just NBEP capacity (okay) or is the intent to make some kind of regional assessment? The output makes this sound like a very ambitious attempt to document a wide range of partner needs. That's going to be a lot of work. Suggest limiting this to idenitfying priority capacity needs of NBEP and partners to identify, assess feasibility, plan and design projects. Costs for implementation and maintenance would be difficult to accurately project unless constrained to a subset of projects. | RI DEM Office of Water | Scope of NBEP Finance Plan has been clarified. Intention is to develop a plan that ensures funding for NBEP to provide services, guides NBEP's external funding decisions, and plans efforts to increase overall funding for restoration projects. The latter goal will entail some work to estimate general funding needs across the region, but will be used only for illustrative purposes as we work to secure more funding. |
| People | Finance Plan Action | Finance Plan Action | Line 1233: Be careful with this text to not sound like you are lobbying. | RI DEM Office of Water | Acknowledged. |
| People | Finance Plan Action | Finance Plan Action | Line 1247: Edit - use "needs" instead of "issues". | RI DEM Office of Water | Edited. |
| People | Finance Plan Action | Finance Plan Action | Line 1253: Given recent federal changes, recommend deleting the last reference to EJ areas. | RI DEM Office of Water | Edited. |
| People | Finance Plan Action | Finance Plan Action | There is a great opportunity for a callout box highlighting the discrepancy in federal dollars that the Narragansett Bay region receives in comparison to other watersheds. | Blackstone Watershed Collaborative | NBEP will consider adding a callout box in the introduction to this Action Plan. |
| People | Finance Plan Action | Finance Plan Action | Plain Language suggestion: Find ways to get funding to support environmental projects and programs. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Regional Targets and Accountability Action | Regional Targets Action | Line 1307: Targets need to take into account SNEP regional indicators as well. Would be nice to have the regional and sub-regional tracking, metrics and messaging about conditions well - aligned. | RI DEM Office of Water | Added sentence to address coordination with SNEP about regional indicators. |
| People | Regional Targets and Accountability Action | Regional Targets Action | Line 1311: It is not clear what you are referring to in terms of " formal adoption of targets into coordinated cross- boundary frameworks"? Isn't this about devising some targets and periodically measuring progress toward those. DEM can envision certain targets may help in demonstrating partial progress toward long-term water quality goals. However, the reference in 1297 to accountability and compliance systems to compel action does not seem appropriate. Similar to the comment on Line 541, it is unrealisstic to think the targets would be adopted into DEM water quality realated regulations or be an allowable basis for development of a RIPDES permit. The implication that the targets would somehow be enforceable through regulations should be removed from the CCMP. It would seem necessary in the development of targets to take into account how easily the information to assess progress toward the target can be compiled and assessed. Does the formal adoption refer to the Steering Committee adopting them for the NBEP program or are you presuming other actions by partners? It would appear to be a necessary step to have a strategy/plan for how to promote use of the targets. It's unclear how targets would be used to "compel" action from the non-regulatory NBEP. They can be used to promote voluntary action and ideally spur alignment of interests within a watershed. | RI DEM Office of Water | Clarified intent of this action throughout by replacing "accountability system" with "reporting system" and removing references to compliance systems. |
| People | Regional Targets and Accountability Action | Regional Targets Action | Actio Description: This recommendation [re: targets for estuary segments] maybe should be in Water Improvement Section below but didn't see a similar section on first look.<br><br>My recommendation would be to focus on quantification of pollution reductions. The usefulness of accounting and tracking is holding polluters to account (both PS and NPS) and tracking progress towards restoration. Idea of understanding how land use change is either adding to pollution or how BMP implementation is leading to reductions. Lake Champlain Basin program does a great job of tracking and accounting for pollution reduction. https://dec.vermont.gov/water-investment/cwi/state-vermont-clean-water-projects/clean-water-project-tracking-accounting#SOP<br><br>Other example from NH for Tracking/Accounting: https://www.nhms4.des.nh.gov/nh-resources/pollutant-tracking-and-accounting-project-ptap | EPA Region 1 | Added pollution reductions as a possible topic for target-setting. Added VT and NH examples to Related Resources section. |
| People | Regional Targets and Accountability Action | Regional Targets Action | Plain Language suggestion: Set clear goals for the region and track progress to ensure everyone works together effectively. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| People | Traditional and Cultural Knowledge Action | Engagement Plan Action | Line 1016:Modify the text of this project to have a clear connection to the environmental focus of the CCMP | RI DEM Office of Water | This action has been folded into the Engagement Plan action. |

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| People | Traditional and Cultural Knowledge Action | Engagement Plan Action | Line 1017: Has the NBEP assessed the other available funds that Tribes have access to that can address the needs? We would not want to direct NBEP funds if there are existing federal programs that are readily available for the same purpose. Should this project more appropriately be assist Tribes to secure funds to undertake resilience and stewardship planning? | RI DEM Office of Water | This action has been folded into the Engagement Plan action. |
| People | Climate Planning Action | N/A (Action Removed) | Line 1069-1076: This paragraph is worded in a way that does not recognize the considerable work that "communities" (state, municipalities, NGOs) have already undertaken. Readily available information on the number of communities in RI that have completed the MRP planning process is available. Statewide vulnerability assessments of water infrastructure have been completed (DEM, DOH) and adaptation actions prioritized. Several wastewater treatment systems have completed implementation of actions. | RI DEM Office of Water | This action has been removed. |
| People | Climate Planning Action | N/A (Action Removed) | Line 1095: Projects: Suggest modifying the first bullet to " Identify the need for and support efforts to integrate watershed-based (cross-boundary) resiliency assessments into state and local planning. | RI DEM Office of Water | This action has been removed. |
| People | Climate Planning Action | N/A (Action Removed) | Line 1099: Delete reference to advocate. Instead use other text such as "Assist in documenting the needs for more robust resilience …." | RI DEM Office of Water | This action has been removed. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1139: OWR does not recall discussion of pursuing the concept of a bi-state compact being discussed in meetings we attended. DEM Will request to discuss this concept before providing additional comment. There are a variety of mechanisms among the state programs that facilitate coordination. Has the NBEP identified particular areas of concern with "coordination" among the two states current activities that tie to environmental outcomes? (DEM notes that due to the differences in legal authorities and organizational structure, it is not reasonable to presume that the programs or environmental standards will be exactly consistent across the Region. ) Consider changing to "Convene discussions on interstate coordination between MA and RI to identify opportunities for enhanced collaboration." | RI DEM Office of Water | This reference has been removed. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1141: Consider moving this to the stormwater section unless there is a policy angle that can be articulated. | RI DEM Office of Water | This Action has been removed; stormwater financing has been addressed in the Water Quality Improvement Action Plan. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1148: Ideally, during the development of the CCMP, there would have been a more wholistic assessment of critical funding needs. It does not seem appropriate to call out just a couple in this list. Modify this to indicate that funding to sustain or expand financial assistance for resiliency, water quality and habitat programs is a priority. Does this really belong in the "Natural Resource Policy" bucket or would this point fit better as discussion in the introductory section of the CCMP where funding need and program capacity limitations could be discussed as well as under the Finance Plan. | RI DEM Office of Water | This action has been removed. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1150: Assuming you mean wastewater reuse, the statement implies it is not "enabled". DEM current policy allows for wastewater re-use in certain situations, e.g. industrial, irrigation, agricultural. What's the intent here? Expand re-use? | RI DEM Office of Water | This action has been removed. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1154: What about MA Needs? | RI DEM Office of Water | This action has been removed. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1158: This paragraph should be revised. Do not mention advocacy. Appropriate roles of the NBEP would be to convene, research, develop information on policy options, educate and coordinate workgroups. The program loses its identity if it engages in the same type of advocacy that is undertaken by NGO advocacy partners. There is no background or clear explanation provided for the statement "Seek authorization for a range of interjurisdictional policies". Seek from who? | RI DEM Office of Water | This action has been removed. |

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| People | Natural Resource Policy Action | N/A (Action Removed) | Line 1171-1176: The project descriptions here appear to lack consideration of the many existing plans produced by the governmental or resource management entities that have likely identified policy priorities already. Does the propsed project duplicate the work that went into wildlife action plans? NPS plans? Can the CCMP identify a few priority policy topics that would be areas to initially focus on rather that seemingly re-invent the wheel across the broad list of policy topics mentioned? The output of a matrix also seems unwieldy if you are being broadly inclusive. Suggest the potential projects and outputs be completely re-thought. Consider a revised process: NBEP reviews existing plans (Wildlife Action, NPS etc.) and take input from partners, compiles lists of recommended policy topics that have potential for bi-state or interjurisdictional interest, solicit input on priorities and with Steering Committee select a few to focus on. Evaluate the appropriate next steps - policy research, formation of a work group etc. Outputs - Reports on select policy topics. Outcomes - adoption of policy changes that advance CCMP goals and objectives. | RI DEM Office of Water | This action has been removed. NBEP inserted the suggested process as a potential project under the Engagement Plan action to allow flexibility in topic. |
| People | Traditional and Cultural Knowledge Action | Engagement Plan Action | Action Description: Particularly valuable to record/share narratives from fishers and aquaculturists in the watershed who have had long history and exposure to different levels of estuarine water quality. | EPA Region 1 | This action has been folded into the Engagement Plan action, but NBEP will highlight fishers and aquaculturists as priority audiences. |
| People | Traditional and Cultural Knowledge Action | Engagement Plan Action | Cultural Relevance: Expand on how traditional and cultural knowledge is incorporated into specific actions, beyond general integration. | Save The Bay | This action has been folded into the Engagement Plan action. |
| People | Traditional and Cultural Knowledge Action | Engagement Plan Action | Plain Language suggestion: Use the knowledge and practices of Indigenous people and local communities to help care for the environment. | Save The Bay | This action has been folded into the Engagement Plan action. |
| People | Climate Planning Action | N/A (Action Removed) | Potential Projects: Updates to this study may be worthwhile in the future: https://dem.ri.gov/environmental-protection-bureau/water-resources/research-monitoring/impact-climate-change-ri | EPA Region 1 | This action has been removed, but NBEP will call out this study in one of the wastewater actions. |
| People | Climate Planning Action | N/A (Action Removed) | Climate Change Adaptation Climate Refuge Areas: Consider identifying and preserving areas that could serve as refuges for wildlife displaced by climate change. Some of this work is in the RIWAP. | Save The Bay | This action has been removed, but NBEP will call out this study in one of the habitat actions. |
| People | Climate Planning Action | N/A (Action Removed) | Plain Language suggestion: Work on strategies to protect people and nature from the effects of climate change. | Save The Bay | This action has been removed. |
| People | Climate Planning Action | N/A (Action Removed) | Include a discussion related to managed retreat from flooded coastal areas. Although this may be further in the future I would like to see an analysis done of at least one area that looks at how this process could be implemented. This is planning for more than relocating buildings, it includes planning for future salt marshes as current areas become inundated. | Blackstone River Watershed Association | Projects were clarified or added to Habitat Plans to address the need to understand policy implementation for marsh migration and managed retreat. |
| People | Natural Resource Policy Action | N/A (Action Removed) | Plain Language suggestion: Support the creation of new rules and policies to protect water, land, and wildlife. | Save The Bay | This action has been removed. |
| Water Quality | Introduction | Introduction | Line 1373: edit "Improve water quality to support healthy ecosystems and communities. With respect to pathogens, " | RI DEM Office of Water Resources | Modified Water Quality Action Plan Goal to "Improve water quality to support healthy ecosystems and communities." |

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| Water Quality | Introduction | Introduction | Line 1375: delete "significantly"; DEM has not modified the impairment designation for low DO in the Bay since 2012. It would be better to simply note there have been improvements without characterizing them further in that sentence. Re-order paragraph to lead with discussion of nutrients, followed by pathogens - CSOs. On nutrients, consider adding in content on the greater reductions achieved for the upper bay sub-region; e.g. Providence River ( see recently released Integrated Report Dec 2024 - page 25.) Suggest you provide this description and then add the reference to overall reductions to bay as a whole. It would be appropriate to note the partial progress toward compliance with water quality standards and highlight the notable delistings for low DO on the tributary rivers. It is also important to note that the investments in planning and implementation of WWTFs upgradeds occurred over a lengthy period of time - 20+ years that goes back farther than the last CCMP (2012). Also - the clarify what the reference to harmful chemicals is referring to. Are these changes that occurred over a longer period of time (e.g. industrial pretreatment?) | RI DEM Office of Water Resources | Paragraph edited as follows: Water quality in Narragansett Bay has improved since 2000. Between 2000–2012, summer nitrogen loadings to Narragansett Bay were reduced by 50 percent due to upgrades to nutrient treatment capacity at wastewater treatment facilities in Rhode Island and Massachusetts that discharge into the upper Narragansett Bay region. Between 2016–2021, nitrogen loads were reduced by 70–76 percent when compared to pre-nitrogen reduction efforts in the early 2000s (RIDEM 2024b). Decreased nutrient loading from wastewater discharge contributed to an ongoing trend of reduced chlorophyll-a (excess phytoplankton) and hypoxia (low dissolved oxygen) in the bay (NBEP 2020a, NBEP 2020b, NBEP 2021b, Codiga et al. 2022) (Figure 7). A recent analysis of Bay water quality has shown partial progress toward compliance with water quality standards, most notably a reduction in the average number of hypoxic days at most stations, excluding the Seekonk River (RIDEM 2024b). The Blackstone River was delisted in 2022 for impairments related to low dissolved oxygen. |
| Water Quality | Introduction | Introduction | Line 1396-1411: Modify this description to be more accurate. The shellfish growing areas referenced are still managed with only a portion designated as approved and the remaining areas opened conditionally. See Integrated Report dec 2024 - page 24. | RI DEM Office of Water Resources | Edited content to clarify. |
| Water Quality | Introduction | Introduction | Line: 1398-1399: Suggest changing to planning for the opening of beach facilities...Rose Larisa/Crescent Park expected to be open for swimming 2026 (as noted in callout box). Need to modify sentence to be to clear here they aren't open yet ( only in the planning stage). | RI DEM Office of Water Resources | Removed reference to swimming in this section. |
| Water Quality | Introduction | Introduction | Line 1406-1411: Both completed CSO abatement phases 1 and 2 contributed to the changing of shellfishing restrictions. In addition, you may also want to cite urban stormwater retrofitting as part of redevelopment and new development that also has contributed. | RI DEM Office of Water Resources | Edited to add CSO abatement phase 1 and stormwater retrofits. |
| Water Quality | Introduction | Introduction | Line 1412-1414: The discussion of toxics needs more context and detail. Are you suggesting additional decline since 2012 (last CCMP) or referring to longer term trends due to industrial pretreatment etc. which occurred well before 2012. Be more precise about where in the environment that contaminants are a concern: sediments, fish tissue, land-based sites versus the water column. | RI DEM Office of Water Resources | This discussion has been moved to relevant Actions in the Habitat and Public Spaces Action Plans. |
| Water Quality | Introduction | Introduction | Line 1415-1420: Improve this summary paragraph with more content. See RI Nonpoint Source Plan Section 2.5.4 on Estuarine Water Quality. DEM agrees meaningful progress has been made, but this paragraph should provide a stronger, less general description of the remaining challenges. In addition to stormwater and wastewater topics, you could note emerging contaminants, particularly PFAS ,and fish tissue contamination as current management issues that need additional characterization and attention. The challenge with stormwater includes the maintenance of BMPs being installed across the landscape and developing sustainable funding sources. A challenge with wastewater includes replacing/upgrading aged infrastructure to prevent sewer system overflows (SSOs) that occur due to breakages, etc. | RI DEM Office of Water Resources | The Water Quality Improvement Action Plan Action has been largely rewritten. |
| Water Quality | Introduction | Introduction | Line 1420: CSO Box - While drilling for the Phase III tunnel was completed in 2024, be clearer that it is not yet operational. Work is continuing on the connecting pump stations, shafts and connecting piping. Projected to be complete with that additional work in 2026-2027. Note this is only the first part of Phase III - which has 4 parts. Additional work planned is expected to continue after an updated fiscal analysis/re-evaluation. | RI DEM Office of Water Resources | Clarified in text. |

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| Water Quality | Introduction | Introduction | In the RestoredWatersRI callout box, Suggest removal of the word “directly” in this sentence – “Together, the Phase One and Two tunnel and pipes capture more than 50% of the combined sewage flows that would have otherwise drained directly into the Providence River.” Some of the impacted CSOs are located on freshwater rivers (e.g., Woonasquatucket and Moshassuck) and would not discharge directly to the Providence River. | Narragansett Bay Commission | Edited. |
| Water Quality | Introduction | Introduction | Line 1422: Lead with "" Untreated stormwater discharges constitute a widespread and major pollution concern in the Narragansett Bay Region that are associated with beach closures, shellfish closures and the transport of pollutants that contribute to water quality and aquatic habitat degradation. (DEM Integrated report 2024-pg 21) | RI DEM Office of Water Resources | Sentence added to text with slight modification. |
| Water Quality | Introduction | Introduction | Line 1425: delete "newer and emerging"; VOCs have been on DEM's radar for a long time, the others are more in the emerging category. Suggest rewording to " In addition, there is growing public concern and management attention to issues associated with pharmaceuticals, microplastics and especially PFAS". Early indications are that these pollutants are widespread in the environment, including being present throughout the Narragansett Region. The impacts of these pollutants on the environment and public health are not fully understood and continue to be the subject of research while management programs undertake initial actions to prevent and mitigate their impacts. | RI DEM Office of Water Resources | Text added to document with slight modifications. |
| Water Quality | Introduction | Introduction | Page 47 – last sentence: Should say “States and EPA” …given MS4 implementation in MA is through EPA. | RI DEM Office of Water Resources | Text added. |
| Water Quality | Introduction | Introduction | Page 48 - Untreated or partially treated wastewater contains pathogens, nutrients, heavy metals,<br>pharmaceuticals, and other contaminants harmful to the environment and public health. There are 19 publicly-owned WWTFs in Rhode Island, 19 in Massachusetts, and one in Connecticut that discharge treated effluent into the Narragansett Bay region. Of these facilities, 11 in Rhode Island and six in Massachusetts ~~are~~ have implemented additional technologies to reduce nitrogen loading in effluent. These facilities have achieved significant reductions in nutrient loading to the region’s waterways since the publication of NBEP’s 2012 CCMP. Continuing to upgrade<br>facilities to remove more pollutants before discharging effluent will continue to yield water quality improvements in the region (Action: Water-3.1). Currently, the Westerly, Rhode Island WWTF ~~is being considered~~ has approved design plans for upgrades necessary to reduce nitrogen loading with construction estimated to be completed in 2028. In Massachusetts, many facilities | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Introduction | Introduction | Page 49 - Combined sewer systems, where both wastewater and stormwater flow through the same pipes, are ~~common~~ present in several urban areas in the Narragansett Bay region, including in the wastewater systems of the Narragansett Bay Commission (~~serving~~ including metropolitan Providence, Pawtucket and Central Falls) ~~and the Rhode Island portion of the Blackstone Valley~~ ), City of Newport, City of Taunton, City of Worcester, and City of Fall River. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Introduction | Introduction | Add "s" after CSO acronym. | MassDEP | Edited. |
| Water Quality | Introduction | Introduction | Page 50 - Rhode Island and suggested adaptive strategies for vulnerable facilities, including hardening, relocation, utilizing readily repairable or replaceable equipment, ensuring redundancy, and wet weather bypass (RIDEM 2017). For septic and other onsite wastewater treatment systems<br>(OWTS), increased flooding and soil saturation from increased rainfall or sea level rise can reduce the ~~size and~~ treatment effectiveness ~~capacity~~ of the leachfield. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Introduction | Introduction | Callout Box: Insert "Future " into the title of the box.. "Future Beach Opening". Modify to improved water quality conditions in the upper region of Narragnsett Bay….instead of bay-wide | RI DEM Office of Water Resources | Text modified. |
| Water Quality | Introduction | Introduction | Line 1439: Strengthen this discussion by adding that stormwater discharges have been implicated in a majority of TMDLs in RI and MA ?( cite the 2024 Integrated report for RI page 21 and check with MA DEP if you can say the same. | RI DEM Office of Water Resources | Text added. |
| Water Quality | Introduction | Introduction | Line 1442: IC discussion: Give the reader a better idea of what level of IC is of concern. See DEM NPS Plan intro on section 2.2. 10% is a common benchmark but research has also shown impacts in certain situations occurring below that IC level. Correct to say more than 60% … | RI DEM Office of Water Resources | Context added. |

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| Water Quality | Introduction | Introduction | If possible, it would be great to show a map either of the watershed as a whole (from the 2017 State of the Watershed Report) or % impervious by HUC12. | Blackstone Watershed Collaborative | Map added. |
| Water Quality | Introduction | Introduction | Line 1444-1449: It would be a stronger point to state that the watershed region needs more effective stormwater management that embraces strategies to (1) prevent additional stormwater pollution from new and re-development and (2) to retrofit much of the already built urbanized landscape that was not originally designed to properly treat the resulting stormwater discharges. It would be further appropriate to mention the significant role of municipalities under the mandated MS4 Program ( can you estimate a % of coverage of MS4 jurisdiction across the three subregions? Then move into discussion of LID and Green infrastructure.. Shift mention of Agriculture to the end. | RI DEM Office of Water Resources | These suggestions have been incorporated into the text. |
| Water Quality | Introduction | Introduction | Line 1455: change start of paragraph; With the reference to LID in this paragraph, you should insert the word "preventing and " in the first sentence ahead of reducing. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Introduction | Introduction | Line 1457-1465: LID vs. GSI/BMPs; Recommend clarifying the use of the terms LID and green infrastructure throughout the document and use them consistently. LID is general understood to be the comprehensive planning and design approach to site development and involves more techniques or strategies than simply structural green infrastructure BMPs to minimize and manage stormwater runoff. (Examples: Narrower road widths, clustering housing etc.) It is integrated with local ordinances and generally applied to land use development/redevelopment. It would be an appropriate project to have NBEP foster more adoption of LID in local ordinances. Green infrastructure is typically referring to structural BMPs. See description of these terms in the DEM NPS Plan - Section 3.4. Change the end of first sentence to " low impact development (LID) strategies, and agricultural BMPs including those recommended by NRCS. " In line 1460 ... Suggest ... "that uses a variety of strategies including green infrastructure to minimize and manage stormwater. Modify sentence to " Integrating LID principles in planning for land development and identifying and prioritizing stormwater pollution hotspots for retrofitting of green infrastructure and other effective BMPs are priority actions. Delete LID in front of BMPs and insert stormwater in the next sentence. | RI DEM Office of Water Resources | The terms "LID" and "Green Infrastructure" have been clarified throughout. |
| Water Quality | Introduction | Introduction | Line 1468: If you leave Action 2-1 where it is, then this cross-reference should be better explained as the role people can play in preventing trash and pollutants from getting into stormwater. Alternatively that action as written might be better placed in the stormwater section. | RI DEM Office of Water Resources | This section of the introduction has been better integrated. |
| Water Quality | Introduction | Introduction | Line 1474: Content would be strengthened here by noting how many ofhte WWTFs are operating with advanced treatment to reduce N pollutant loadings. | RI DEM Office of Water Resources | Section is updated with appropriate information. |
| Water Quality | Introduction | Introduction | Line 1477: How many WWTFs are currently committed to future upgrades? You should acknowledge the active planning and design work underway to upgrade WWTFs that is occurring; e.g. in RI that's generally limited to Westerly WWTF in terms of further nutrient reductions. This type of detail provides stronger context. | RI DEM Office of Water Resources | Section is updated with appropriate information. |
| Water Quality | Introduction | Introduction | Line 1480-1484: The paragraph should include statement of the need to continue to implement strategies to phase out cesspools that is separate from the discussion on promoting advanced treatment septic systems. It would be appropriate to indicate where in the region this is a significant management concern: coastal ponds and explain the explain the need for advanced systems to reduce nitrogen - the nutrient concerning coastal waters. You should also highlight the need for maintenance. | RI DEM Office of Water Resources | Context added. |
| Water Quality | Introduction | Introduction | Line 1486: Add content to introduce what a CSO is either here or earlier in the section and describe where they are active in the NBEP region. | RI DEM Office of Water Resources | Definition and locations added. |
| Water Quality | Introduction | Introduction | Line 1490: Need to add more introductory content here that long-term CSO abatement infrastructure work is ongoing. Then make the point that complimenting that work includes sewer separation and retrofitting of green stormwater infrastructure that can reduce the volumes directed into the CSS. | RI DEM Office of Water Resources | Context added. |
| Water Quality | Introduction | Introduction | Is the lack of spacing in RestoredWatersRI intentional? | Blackstone Watershed Collaborative | Yes, the name of the project lacks spacing. |

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| Water Quality | Introduction | Introduction | add "redevelopment" after "new and" in the sentence beginning "Sewer separation, retrofitting existing infrastructure…" under the Combined Sewer Overflows header. | Blackstone Watershed Collaborative | Edited. |
| Water Quality | Introduction | Introduction | Line 1496: Change first sentence to be broader. "Changes in the seasonality and increases in the frequency and intensity of precipitation events has significant implications for water quality management." Existing water infrastructure, including wastewater and stormwater systems, based on prior design assumptions, may become less effective at pollution control over time and need to be adapted to changing conditions. Delete sentence on CSS. Flooding...WWTFs which are typically located in low-lying areas. When flooding...treatment capacity and reliability of ...Delete next sentence. Move text from 1509-1514 inotthe box on climate change. | RI DEM Office of Water Resources | Content from this callout box has been migrated to the Resiliency Considerations paragraph, but the intention of this comment has been addressed. |
| Water Quality | Introduction | Introduction | Line 1520: To better parallel the habitat section, add an objective for Watershed Planning and describe the importance of watershed plans including TMDLs to guide restoration actions. Paralleling the RI NPS Plan - the order in ithis Water Quality Section should be watershed planning, stormwater, wastewater, trash and marine debris. Also recommend segregating the trash and debris as its own objective as it is not solely associated with stormwater. | RI DEM Office of Water Resources | New Land Use and Watershed Planning Action has been added and the Trash and Marine Debris Action has been assigned an objective. |
| Water Quality | Introduction | Introduction | Figure 7: My comment is really on Figure 7, why does this only go to 2019? If there is no data in the last 5 years, that points to one issue. If there is data, but it is not publicly available that points to a separate issue. | EPA Region 1 | The associated paragraph has been edited to clarify that this image is from an updated published in 2021. |
| Water Quality | Introduction | Introduction | Page 49 of the PDF – The recent edits resulted in a typo – the first sentence is missing the closing parentheses after “Central Falls”. | Narragansett Bay Commission | Edited. |
| Water Quality | N/A | Land Use and Watershed Planning Action | Add Blackstone Watershed Collaborative to the list of implementing partners. | Blackstone Watershed Collaborative | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1531: suggest edits: "..the use of effective designs for stormwater BMPs tailored to site conditions to protect water quality and in many cases prevent or mitigate flooding. This will be accomplished by updating and standardizing stormwater BMP design manuals, including various green infrastructure BMPs, promoting the adoption of low impact development (LID) practices, and by ..." | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1538: delete "newer"; Revise to say " A combination of conventional gray and green infrastructure practices have been used in managing the quantity and quality of stormwater throughout the Narragansett Bay Region. We don't consider green infrastructure particularly "new". It could be good to make the point that the designs and technologies supporting green infrastructure are varied and continuously evolving. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1541: In the context of upgrading infrastructure, change LID to Green infrastructure. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1546-1547: NBEP will be partnering with RIDEM to secure securing funding with the intent to update the Rhode Island stormwater design manual. | RI DEM Office of Water Resources | Text added to Potential Projects section of this Action. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1551: edit; Insert "and properly maintain" after implement | RI DEM Office of Water Resources | This sentence has been substantially modified. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1553: edit; Providence Stormwater Innovation Center…. Effectiveness of stormwater BMPs.. (LID refers to the planning and design process). Delete second LID. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1557: It would be appropriate to introduce the concept of workforce development to support stormwater management | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1562: edit; "reword… additional challenges for management of stormwater infrastructure. Good place to note that much of the existing stormwater infrastructure is considered undersized and not adequate to handle the frequency of larger storms that now occur." | RI DEM Office of Water Resources | This section has been removed; however, NBEP will make reference to undersized infrastructure elsewhere in the Action. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1571: substitute "protocols" for BMPs to avoid confusion. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1574: Add project: Support public education and outreach activities regarding stormwater topics. (This could include partnering with MS4 communities. Greater awareness is really needed to drive support for sustainable funding.) | RI DEM Office of Water Resources | Edited. |

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| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1588: Not clear how the broad indicator categories will yield a lot of specific information about stormwater outcomes alone. There's likely a need for refined metrics under these categories. Not specific to this report – general observation. Some federal (seems like EPA especially) agencies use acres closed to shell fishing as a metric. However, they don't consider that many areas are closed for non-water quality reasons. Examples in RI include thousands of acres closed to shellfishing due to military security zones around the Newport Navy Base and Quonset / General Dynamics. | RI DEM Office of Water Resources | NBEP concurs with this general comment and would support an effort to develop targeted metrics. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Line 1593: Partners should include Rhode Island Infrastructure Bank. (Stormwater Accelerator Program) | RI DEM Office of Water Resources | Added. |
| Water Quality | Stormwater Guidance and Education Action | Stormwater Guidance and Education Action | Plain Language suggestion: Teach communities how to handle rainwater runoff to prevent pollution. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | This Action will support design, construction, and maintenance of stormwater retrofit projects, especially green infrastructure BMPs, that ~~reduce flooding,~~ improve water quality, help mitigate flooding, and increase resilience to intensifying precipitation. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | For example, by using green infrastructure BMP retrofits alongside other water quality improvement actions, the bacterial impairment for recreation use in Greenwich Cove was removed from Rhode Island's 2016 303(d) list of impaired waters ~~for bacteria~~. The project featured stormwater catch basin upgrades, street sweeping, sewer main replacement, correcting illicit connections, and connecting a failing septic system to central sewer. Greenwich Cove remains on the Rhode Island 303(d) list for other impairments. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Plain Language suggestion: Upgrade existing systems to reduce the impact of rainwater runoff on rivers and streams. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1622-1625: DEM doesn't agree with this description. Suggest the following: Sources of stormwater pollution are typically identified through inventories and mapping of outfalls, including CSOs, analysis of land use, water quality assessment, TMDLs and other studies including flood mitigation planning. You then need to provide more context here on the role of the MS4 program, TMDLs and other federally required actions (industrial stormwater permitting etc.) which drive retrofitting and can include prioritization on a subwatershed scale. Then move to the steps typically involved in the process: site identification, feasibility assessment of options, conceptual design etc. | RI DEM Office of Water Resources | Changed description and added text. Identifying sources of stormwater and stormwater pollution through inventories and mapping of outfalls, including CSOs, analysis of land use, water quality assessment, TMDLs, and other studies and reducing or eliminating them closest to their sources is foundational to effective stormwater management (Action Water-1.2: Land Use and Watershed Planning). Municipal Separate Storm Sewer Systems (MS4) are publicly owned or operated systems that discharge stormwater into waterways. If an MS4 discharges into an impaired waterbody, it is typically subject to maximum daily load (TMDL) requirements, which sets limits on the amount of a pollutant a water body can receive and still meet water quality standards. The process of identifying and mitigating sources of water pollutants usually involves some form of problem identification and assessment, feasibility assessment of options, conceptual design of solutions, then implementation, monitoring, and adaptive management. |

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| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1626: You don't need LID at the start of this sentence. The example of retrofitting leading to removal of a bacterial impairment in Greenwich Cove is on of the RIDEM NPS Success Stories and would be a good example of how retrofitting can pay off.https://dem.ri.gov/sites/g/files/xkgbur861/files/2022-06/success-story-greenwich-cove.pdf | RI DEM Office of Water Resources | Revised paragraph: Green infrastructure BMP retrofits can augment underperforming or failing systems or add additional capacity or lifespan to functioning systems. CExamples of common BMPs include bioswales, cisterns and rain barrels, dry wells and infiltration trenches, rain gardens and bioretention, permeable paving, and trees; new technologies and approaches continue to evolve. For example, by using green infrastructure BMP retrofits, Greenwich Cove was officially removed from Rhode Island's 2016 303(d) list of impaired waters for bacteria. The project featured stormwater catch basin upgrades, street sweeping, sewer main replacement, correcting illicit connections, and connecting a failing septic system to sewer.<br>Farms can also implement BMPs such as manure management, manure retaining systems, conservation buffers, and livestock fencing. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1627: Good spot to note there are a variety of BMPs and that new technologies and approaches continue to evolve. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1632-1634: If you are noting opportunities for guidance on stormwater BMP design you should be mentioning the SNEP Network as well as those services focused on agriculture. It would also provide more context to note what RIDOT and NBC are doing related to stormwater projects that opens up potential partnership opportunities. | RI DEM Office of Water Resources | This paragraph has been removed from this Action; however, this comment will be reflected in the Stormwater Education Action. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1639: Mention here that much of the existing stormwater infrastructure was not designed for the frequency of intense storms that are being experienced. | RI DEM Office of Water Resources | This section has been removed, but the intent of the comment will be reference elsewhere in the Action. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1642: replace overbuilding with expanding | RI DEM Office of Water Resources | This section has been removed. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1644: Change first project to "Compile priority locations in need of retrofits, ideally on a watershed basis, and fund projects to plan, design and implement green infrastructure or other LID techniques when feasible. | RI DEM Office of Water Resources | Project has been moved to Land Use and Watershed Planning Action. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1651: I'd use the terminology "sustainable" funding to support more effective stormwater management on state and local levels. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1656: ..edit: ..Plans that incorporate BMPs specific to their operations that mitigate stormwater impacts. | RI DEM Office of Water Resources | Project language modified. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Line 1677: RI perspective: Suggest there is too much emphasis on CSOs which are active is a relatively small % of the NBEP region. If we are talking about water pollution, then priorities should reflect that with recognition that municipalities also have heightened concerns about flooding and that projects can therefore often deliver co-benefits. | RI DEM Office of Water Resources | NBEP has modified the tone of this Action to better reflect concerns across the region. |
| Water Quality | Stormwater Retrofits Action | Stormwater Retrofits and Maintenance Action | Potential funding sources section: MassDEP's NPS Management Section in the Watershed Planning Program administers two EPA-funded grant programs under the CWA: the CWA s.604(b) Water Quality Management Planning Grant and the CWA s.319 NPS Implementation Grant. I am not sure if the "Section 319 Nonpoint Source Grants" referred to both MassDEP and RIDEM, but I provided the MassDEP information above. | MassDEP | Edited in document text and Action Matrix. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Potential Projects: This could also be a Potential Project under Water 1.2. | EPA Region 1 | Acknowledge - no action. |

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| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Plain Language suggestion: Improve large wastewater systems to keep pollution out of water bodies. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | As of Summer 2025, final design of upgrades to the City of Westerly's wastewater treatment facility, which discharges to the Pawcatuck River, have been completed ~~is undergoing facilities planning to~~ meet new reduced nutrient limits in their Rhode Island Pollutant Discharge Elimination System (RIPDES) permit. Construction is planned through fall of 2028. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1784: This needs more content/context about the NBEP region. In general, how well WWTFs are performing a this time? How many SSOs? Etc. | RI DEM Office of Water Resources | The information in this Action has been substantially modified. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1789: change controlled to regulated; add the word delegated state programs | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1792: Strengthen with more context about the nutrient reduction strategy for the upper bay, the amount of time it took to implement and the partial progress that has been made toward water quality goals. | RI DEM Office of Water Resources | Edited. Also addressed in Action Plan introductory material |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1796-1797: Westerly WWTF is undergoing facilities planning to meet new reduced nutrients limits in their RIPDES permit, should confirm with CTDEEP but Stonington nutrient reduction upgrades are active | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1806: The full third phase of CSO abatement is not going to be fully completed in 2027. Get clarification from NBC. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1808: It would be appropriate to add some content reinforcing the need to address aging infrastructure, mention that sewer systems overflows result from breakages in the lines, etc. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1820: add in the comment field text between "(RIDEM 2017). ** Local"; **As of 2018, RIDEM has been including a resiliency planning condition in WWTF RIPDES permits as they are reissued. These planning conditions require that WWTFs develop a schedule of short- and long-term actions that will be taken to maintain operation and protect key collection and treatment system assets. The Resiliency Plan shall include, but not be limited to: (i) an assessment of current and projected impacts from natural hazards on critical components within the collection and treatment systems, as well as on the systems themselves; (ii) a plan to adapt and protect vulnerable components and systems; (iii) an analysis that provides justification for selected adaptation methods. The analysis must consider component and system design life and sea-level rise projections. For the purposes of this Resiliency Plan, critical components are considered those necessary to ensure the forward flow and treatment of wastewater in accordance with the limits set forth in this permit. The Resiliency Plan shall also consider impacts on the WWTF from neighboring facilities during high hazard events. | RI DEM Office of Water Resources | The Action has been updated to include information about WWTF resiliency planning in the region. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | LIne 1827: DEM questions the need for this product as worded. There are facility planning and prioritization schemes in place ( PPL) that already exist. It would be value added for NBEP to compile a matrix of major wastewater infrastructure projects for the region and track their status in order to foster community awareness and support for such work. Alternatively, compiling - not duplicating - estimated pollutant loadings and tracking those on a watershed basis across the region would be another potential project. Similarly, tracking projects undertaken in the region to improve resiliency could be helpful. | RI DEM Office of Water Resources | This project was edited to better reflect the comment. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1830: This project needs some context somewhere in the write-up. There are a layers of technical assistance currently available and generally speaking the RIIB can accommodate borrowers. Getting on the PPL is generally not a constraint. It would be appropriate to continue to explore options for expanding the types of projects aligned with the CCMP that might benefit from participation in the CWSRF. | RI DEM Office of Water Resources | This project was edited to better reflect the comment. |

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| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1833: Modify this output. WWTF upgrades are determined by permitting, separate prioritization schedule won't change regulatory requirements. You could consider some type of report card system/color coded chart of compliance with permit or outputs aligned with the project descriptions above. | RI DEM Office of Water Resources | This output was edited to reflect the comment |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1835: Other locations would include Westerly WWTF. | RI DEM Office of Water Resources | The language of this output was rewritten to be more general and inclusive of all improvements throughout the region. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1836: edit: Continued implementation… instead of "completion" | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Line 1844: delete new areas opened for shellfish and recreation; This implies that WWTF are the only reason these are closed. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Clarify that 60% of the annual volume of combined sewer overflows have been eliminated by the construction of the Providence storage tunnel. As written, it's not clear what the percentage refers to (volume, number of outalls, or number of overflow events). | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | NBEP will support partners in the implementation of this action. In addition, NBEP can work with partners to ~~monitor and~~ track permit compliance at WWTFs to prioritize upgrades. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | The paragraph that begins with "Approximately 60 percent…" - this paragraph lists some incorrect statistics regarding the NBC's CSO work. The callout box on page 46 has correct stats. Specifically - a) Paragraph on page 65 suggests percentages of reductions of CSO discharges are applicable to Narragansett Bay as a whole. The NBC's work only impacts CSO discharges to the freshwater rivers in the Providence area and to the Seekonk and Providence River estuaries. I have no sense of the status of CSO abatement of the other agencies/municipalities who CSOs discharge to the Bay; b) Phase I and II of NBC CSO Abatement have reduced discharges of NBC CSOs by 50+%. When Phase III is complete, NBC CSO discharges will be reduced by a total of 93% (again, the stats in the callout box on p46 are correct. | Narragansett Bay Commission | This paragraph has been deleted as NBC's CSO work is highlighted in the Action Plan introduction. In its place, a short sentence has been added to the first paragraph in the Action Description: "Further, significant work is ongoing to reduce combined sewer overflows by repairing and replacing sewer infrastructure and constructing large stormwater collection tunnels (see RestoredWatersRI callout)." |
| Water Quality | Centralized Wastewater Infrastructure Action | Centralized Wastewater Infrastructure Action | Consider adding a potential project to "Support Worcester in their upcoming Long-Term Control Plan and related public outreach / low-impact development implementation." | Blackstone Watershed Collaborative | Added a potential project to "Support CSO operators to implement Long Term Control Plans and associated public outreach campaigns." |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Plain Language suggestion: Help homeowners maintain and upgrade septic systems to prevent leaks into the environment. CSO Mitigation: Reduce the amount of untreated sewage that flows into waterways during heavy rains | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | A citation is needed for this statement: "Even when working properly, conventional septic systems are inefficient at removing nitrogen and ineffective at removing heavy metals, pharmaceuticals, microplastics, and other contaminants of emerging concern." | RI DEM Office of Water Resources | See response to comment below. |

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| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Why was the following sentence deleted in the final round of edits? Water Action 3.2: “Even when working properly, conventional septic systems are inefficient at removing nitrogen and ineffective at removing heavy metals, pharmaceuticals, microplastics, and other contaminants of emerging concern.” This seems to me to be a factual statement. Just curious if there was a specific reason for deleting it. | Mass Audubon | This sentence was originally deleted from Final Draft V2 due to redundancy with the rest of the paragraph. However, NBEP agrees that it does make a particular point about the importance of considering the impacts of functional as well as failing and poorly maintained septic systems. The sentence has been re-added to Final Draft V3, modified and cited as such: "Residential septic systems have been linked to nitrogen loading (Valiela et al. 1992, Cole et al. 2006; Reay 2004), micropollutant pollution (Phillips et al. 2015), and organic wastewater contaminant pollution (Swartz et al. 2006) in coastal bays via transport through groundwater. Further, areas with high septic system density have been shown to contribute more to pathogen loading in waterways compared to areas with low septic density (Sowah et al. 2017)." |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | ~~Within~~ In the Narragansett Bay region, ~~management actions to address OWTDS are mainly concentrated in~~ the Coastal Salt Ponds watersheds have been the focus of significant management action to address OWTDS given the known contribution of ~~where~~ onsite systems ~~are known to contribute~~ to water quality degradation in this area. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1873: need clarification Unclear what other systems these are referring to, if cesspools are under the OWTS umbrella in this reference, then they can't be upgraded, must be eliminated/conversion to septic or sewer | RI DEM Office of Water Resources | This section has been edited for clarity. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1876: Somewhere in this section, more context about where in the NBEP region onsite systems are a management concern should be discussed. They are a priority in the coastal ponds and in some embayments but are not the focus of management in the urban upper bay regions which are sewered. | RI DEM Office of Water Resources | Context added. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1885: This paragraph does not appear to reflect the facility planning process in place for WWTFs that includes technical evaluation of the needs for the extension of sewer service. In RI, because OWTS have been regulated by DEM for decades, there is data available on OWTS statewide in one place. Further analysis of information could be beneficial but carrying our inventories may not be a need in most places. While knowing where OWTS are impacting water quality is important, the jump to the conclusion that further sewer development needs to be considered is questionable. WWTF plans arae based on 20 years projections etc. What is appropriate to recommend would be that such plans are updated more regularly to reflect changing conditions due to actual growth. | RI DEM Office of Water Resources | This section has been modified as suggested. |

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| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1895: N-reducing septic systems; Consider adding more specific content available on local onsite wastewater management plans from the DEM NPS Plan section 4.42 . Most communities in RI that need one have one but there is a real need to build capacity at the local level. It varies from robust (Charlestown) to very limited. Add content on the fact that RI has requirements for N-reducing systems in targeted areas including the coastal pond region. | RI DEM Office of Water Resources | Updated paragraph: In Rhode Island, municipalities can establish local management programs to encourage or require OWTS maintenance and Onsite Wastewater Management Plans to meet local needs. As of 2024, 21 towns in RI have adopted Onsite Wastewater Plans. Approved Plans make towns eligible to apply to the Community Septic System Loan Program for funding to provide interest-free loans for homeowners to fund septic system repairs and upgrades. Over the past 20 years (Spring 2024), 65 loans have been issued to 19 towns totaling 23 million dollars (RIDEM 2024a). RIDEM establishes minimum standards for alternative or experimental onsite wastewater treatment and disposal systems , and requires advanced nitrogen-removing treatment for new and repaired systems in targeted areas, including the Coastal Salt Pond and Narrow River watersheds. There were 8,537 alternative or experimental treatment components installed in the state as of July 2024. RIDEM cautions that these systems require a greater level of oversight to ensure they operate and perform according to design and desired level of treatment (RIDEM 2024a). |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1906: Consider adding "other projects that build local capacity" into the statement. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1918: modfiy; DEM notes that through a SNEP project, USGS is already looking at the relative contribution of N to RI coastal waters from various sources including OWTS. This work may serve the purpose of identifying where OWTS are a significant contributor. Additional water quality modeling work in the Wood-Pawcatuck may also provide insights. Suggest modifying the project to focus on assessing the concern with OWTS in areas where there area gaps in understanding to avoid appearing duplicative of on-going work. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Onsite Wastewater Systems Action | Onsite Wastewater Systems Action | Line 1920: add project; Encourage proper homeowner maintenance of OWTS including those operating with more complex advanced treatment technologies. | RI DEM Office of Water Resources | Edited. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Plain Language suggestion: Take steps to reduce litter and garbage in waterways and along coasts. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Trash and Marine Debris Trash: work with trash haulers to prevent trash from escaping during hauling. Having cleanup stations at state beaches/ have trash pickup at any state property that sells things. Less emphasis on education and outreach for trash prevention (doesn't work) Expand reuse and refill at all state parks & beaches (water filling stations, BYO containers for soft drinks and use taps instead of bottles) | Save The Bay | NBEP has modified the Potential Projects in this Action. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1694: I recommend segregating this from stormwater and having it be its own objective and adding more content on large marine debris removal. | RI DEM Office of Water Resources | The Trash and Marine Debris Action has been assigned a separate Objective. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1702: edit; trash can worsen flooding and disrupt wastewater operations by clogging waterways and infrastructure… | RI DEM Office of Water Resources | Edited. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1710: The RI Governor's Initiative should be mentioned. See Section 4.4.5 of the DEM NPS plan for more content. | RI DEM Office of Water Resources | Included reference to the Litter Free RI initiative. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1720: delete catch basins; Catch basins are not trash interceptors, some have been retrofitted to settle out floatables and they do accumulate trash but they are not intended to be trash interceptors | RI DEM Office of Water Resources | Deleted |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1736-1737: Trash collection devices in/across rivers/streams are not advised as may impede flow and and capture/entangle aquatic life. Are you referring to devices associated with outfalls? | RI DEM Office of Water Resources | NBEP intends to investigate a variety of devices based on successes reported by other National Estuary Programs. NBEP will consult with partners about the most appropriate options. |

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| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Line 1747: delete catch basins | RI DEM Office of Water Resources | Edited. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | Acknowledge that dozens of organizations contribute to trash cleanup efforts. | RI DEM Office of Water Resources | Text edited. |
| Water Quality | Trash and Marine Debris Action | Trash and Marine Debris Action | In the fourth paragraph, in the sentence beginning "The Commercial Fisheries Research Foundation," include the comma after the word "gear" inside the quotation marks. | Blackstone Watershed Collaborative | Edited. |
| Habitat | Introduction | Introduction | Line 2029: delete legacy; Impacts are not always just legacy | RI DEM Office of Water Resources | Edited. |
| Habitat | Introduction | Introduction | In the second paragraph under Freshwater Habitats, to the sentence beginning with "These barriers," add "warm waters, and create slow-moving impoundments that harbor invasive aquatic plants" after "increase flood risk with increased precipitation" | Blackstone Watershed Collaborative | Edited. |
| Habitat | Introduction | Introduction | To the paragraph under the Freshwater Habitats header about the lower Blackstone dams, ention that NBEP is also "supporting the newly-formed Community Advisory Committee made up of state, federal, tribal, and local officials as well as dam owners and community groups to bring transparency and greater awareness into this complex project." | Blackstone Watershed Collaborative | Added a reference to the Community Advisory Committee in this sentence. |
| Habitat | Introduction | Introduction | Suggest adding link to Storymap. | EPA Region 1 | Links in the text are intentionally limited to the "Related Resources" sections of each Action. Instead, the storymap is now cited in the References as (NBEP 2020c). |
| Habitat | Introduction | Introduction | Estuarine Habitats: There has also been research on New England marshes that link marsh subsidence (especially at creekbanks) to increased nutrients as added nitrate decreases plant root to shoot ratio, decreases to belowground root growth, and alters soil shear strength, leading to destabilization. A few references:<br>https://doi.org/10.1038/nature11533<br>https://doi.org/10.1002/ecs2.2329<br>https://doi.org/10.1016/j.scitotenv.2020.140927 | EPA Region 1 | Sentence and citation added. |
| Habitat | Introduction | Introduction | Estuarine Habitats Call Out Box: Comment on the last section of the callout box: it would be helpful to list at least a few of the monitoring parameters to be established pre-restoration. Ie: vegetation cover, water quality, porewater salinity | EPA Region 1 | NBEP will work with project partners to include this information in the online publication of the CCMP. |
| Habitat | Introduction | Introduction | Freshwater Habitats: Would all these listed benefits be the result of any fish passage projects in the area (ie. adding or upgrading fish ladders), or specifically from dam removal projects? | EPA Region 1 | While only dam removal projects would realize all of the benefits listed in this paragraph, fish passage projects realize some; NBEP believes the wording is broad enough to encompass both types of projects. |
| Habitat | N/A | Biodiversity and Habitat Quality Monitoring | Suggest adding "providing templates for QAPPs" as a potential activity. | Blackstone Watershed Collaborative | Added as a potential project for Habitat-2.2: Habitat Projects. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Line 2161-2167: aligning permit changes; Unclear what permit changes are being referenced. Need to keep in mind differences in governance between the two states. | RI DEM Office of Water Resources | This section has been removed from the final draft. Permitting concerns may be addressed by working groups. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Line 2213: it's unclear ro DEM that a commission is needed to enhance coordination on cross-boundary projects. | RI DEM Office of Water Resources | Reference to commission removed. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Line 2219: Shellfish Restoration Plan is listed as an output isn't really mentioned in the text. Provide more context. | RI DEM Office of Water Resources | Edited project list to reflect assistance NBEP can provide to the Shellfish Restoration & Enhancement Plan development and implementation. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Line 2257: RI Shellfish Management Plan (2014); Note that the 2024 update of the RI SMP is completed (or nearly so). If possible – update to 2024 plan link. | RI DEM Office of Water Resources | As of May 2025, the RI Shellfish Plan is still in development. |
| Habitat | Habitat Plans Action | Habitat Plans Action | There is a need for future assistance with the Shellfish Restoration and Enhancement Plan development. The next steps include additional facilitated public meetings to finalize steering committees, roles, and contributors; feedback on potential alternatives and siting, as well as final review; contributors for mapping and writing chapters. | RI DEM Division of Marine Fisheries | Included in the project list as ways NBEP can provide development and implementation assistance to the RI Shellfish Restoration & Enhancement Plan |

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| Habitat | Habitat Plans Action | Habitat Plans Action | This is a great idea, if nothing else because that information only lives in files at Save the Bay and URI. We can always learn from prior work; however, I am not aware of funding to support this synthesis. Should talk to Rob Hudson and Wenley Ferguson since they conducted much of the work and SAV houses the data. DMF would be interested in assisting with this, but cannot lead the synthesis. | RI DEM Division of Marine Fisheries | NBEP acknowledges the need for funding to complete this synthesis and will continue to bring it forward to committees for consideration. |
| Habitat | Habitat Plans Action | Habitat Plans Action | DMF will be working to develop a modern eelgrass restoration and resiliency plan, based on assisted migration through seed-based restoration. At a high level, this mirrors the general approach laid out in the HEAT proposal, including the SNEP funded flowering phenology and seed collection, seed transfer guidance, to inform seed-based restoration. | RI DEM Division of Marine Fisheries | Potential project edited based on this suggestion. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Implementing Partners: How come EPA Region I is never listed as am implementing partner? We should be for the seagrass strategy, especially since the need for regional coordination. | EPA Region 1 | Ensured EPA R1 is listed as a partner in all the appropriate places |
| Habitat | Habitat Plans Action | Habitat Plans Action | Plain Language suggestion: Develop detailed plans to protect and restore areas where plants and animals live. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Habitat | Habitat Plans Action | Habitat Plans Action | Line 2412: delete duplication of "regulations and regulations" | RI DEM Office of Water Resources | Deleted |
| Habitat | Habitat Plans Action | Habitat Plans Action | Abbreviate Massachusetts Department of Environmental Protection to "MassDEP." | MassDEP | Edited. |
| Habitat | Habitat Projects Action | Habitat Projects Action | Plain Language suggestion: Carry out specific projects to fix damaged natural areas. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | [Updating seagrass site suitability models] is a priority for DMF. We are aiming to prioritize Zostera. We plan to begin this work after completing the Oyster HSI model development – but lack dedicated funding for seagrass HSI updates. LIS is developing a suitability model and BU also have a process that can be locally adapted. DMF has developed a geo-database of existing water quality, soils, and other environmental variables of interest. A limiting factor is likely lack of resolution of temperature, clarity, and salinity in shallow water habitats. | RI DEM Division of Marine Fisheries | edited project to include more information from this comment |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | The SAV Task Force Monitoring Guidance should be updated to reflect current work and future goals. Some members of the task force have discussed this. There are larger regional efforts to update monitoring approaches to better track annual fluctuations and loss of Zostera and inform restoration and resiliency work. A primary goal would be to modernize approaches based on past work and future needs, including the need to better understand how these habitats are responding to stresses from climate change and establish baselines for future restoration approaches. Revisions could include: Revising survey approaches for Tier 2 (to assess density, especially in sparse densities along the bed edges, composition (veg: reproductive), and temp/light; This might be done via a program SAV watchers (see Chesepeak Bay), but requires a dedicated coordinator); revisions for Tier 3 could include: Adding sentinel sites (need to determine goals of sentinel monitoring), sentinel sites (need to determine goals of sentinel monitoring), DMF is expanding ongoing eelgrass surveys to assess and monitor the spatial distribution of Zostera, this includes establishing sentinel sites (begins Jan 2025), as well as quantifying changes in fish and macroinvert use; additional Ruppia monitoring is also needed. | RI DEM Division of Marine Fisheries | edited this project to include more detail |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | Expanding [benthic sediment profile imaging) work to shallow water portions of the coastal ponds would have value, given the lack of existing data. | RI DEM Division of Marine Fisheries | Edited project to reflect these key areas |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | A data gap from the recreational fisher community is lack of information on the “worm hatch” in the coastal ponds. | RI DEM Division of Marine Fisheries | Acknowledged. |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | [Benthic sediment profile imaging] work is generally expensive, so establishing the long-term plan or goals might be a good first step. | RI DEM Division of Marine Fisheries | Added project to include a long-term plan for monitoring benthic habitats. |

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| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | RI DMF is planning to begin [artificial reef assessment] work during our next 4-cycle, with the aim of developing an AR (artificial reef) Plan. However, DMF lacks dedicated funding for the analysis and summary. The primary projects are the Jamestown Bridge, Sabin Point, lobster habitat off Dutch Island, McAllister Point (navy), BI Wind Farm. Future work along the south coast or in the bay should be guided by a state plan. | RI DEM Division of Marine Fisheries | edited this project to include more detail |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | Continue to foster collaboration, research, and data-sharing for a suite of macroalgae species (e.g., kelp/Gracilaria / Ulva / Codium / Fucus) across agencies/institutions on the bay and salt ponds [through SEAC-RI]. The goals of SEACRI are still being refined at this time, however the DEM is interested in how macroalgae can function to both enhance and hinder commercial and recreational fisheries resources. Habitat related characteristics of macroalgae that the agency would like to prioritize include but are not be limited to: seasonal abundance/distribution of sessile and drift algae, habitat effects of drift algae (e.g , rafting/accumulation/how drift algae abundance is related to hydrodamics and prevailing weather patterns), an understanding of how climate change and sea-level rise may be affecting macroalgae abundance within the bay and salt ponds. | RI DEM Division of Marine Fisheries | included a new project to discuss the macroalgae monitoring protocol |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | Potential Projects: Another potential project to consider is using dredged material to restore areas with exposed sediment with high concentrations of contaminants (ex. What Army Corps is proposing for south of Prudence Island). | EPA Region 1 | Project added to list. |
| Habitat | Benthic Habitat Assessment and Restoration Action | Benthic Habitat Assessment and Restoration Action | Plain Language suggestion: Work on restoring underwater habitats like seagrass beds that are crucial for marine life. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Habitat | Aquatic Connectivity Action | Aquatic Connectivity Action | Plain Language suggestion: Remove barriers like dams to help fish and other species move freely through rivers. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Habitat | Aquatic Connectivity Action | Aquatic Connectivity Action | The second paragraph states that high-hazard dams in particular were not built to accommodate more intense storms and nuisance flooding; significant and low-hazard dams were not, either, they just have less impact if they fail. I would suggest beginning this sentence with "Many dams" rather than "High hazard dams" | Blackstone Watershed Collaborative | Edited as suggested. |
| Habitat | Salt Marsh Restoration Action | Salt Marsh Restoration Action | Potential Project: It may be useful to consider beneficial use of dredged material to keep up with sea level rise. | EPA Region 1 | Project added to list |
| Habitat | Salt Marsh Restoration Action | Salt Marsh Restoration Action | Plain Language suggestion: Protect and restore marshlands to help them survive rising sea levels. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Habitat | Salt Marsh Restoration Action | Salt Marsh Restoration Action | Add Mass Audubon to list of implementing partners. | Mass Audubon | Edited in document text and Action Matrix. |
| Habitat | Salt Marsh Restoration Action | Salt Marsh Restoration Action | MA DER should be added as a potential funding source | Massachusetts Division of Ecological Restoration | Added MA DER as a funding source. |
| Habitat | Open Space Action | Land Use and Watershed Planning Action | Emerging Challenges Urban Development Pressures: Address the impacts of increasing urbanization and propose measures to balance growth with conservation. | Save The Bay | See new Land Use and Watershed Planning Action. |
| Habitat | Open Space Action | Land Use and Watershed Planning Action | Plain Language suggestion: Preserve natural areas for wildlife and people to enjoy, keeping them safe from development. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Public Space | Introduction | Introduction | Line 2768: type? "spoiled nature"?; word choice? | RI DEM Office of Water Resources | removed "unspoiled" to read "Safe access to nature ..." |
| Public Space | Introduction | Introduction | Line 2778: "hundreds of";  Given there is  no official count/census, what's the basis of this number? Could it in fact be much higher based on what's listed in 2778 - 2780 | RI DEM Office of Water Resources | changed text to be more specific that "hundreds" refers to coastsal access points, not riverine, and added citation for storymap (NBEP 2021f) |
| Public Space | Introduction | Introduction | callout box: Modify  first sentence, no analysis that it's growing vs. sustained; remaining text still support that public supports conservation funding; simply state that public support... remains strong... | RI DEM Office of Water Resources | "has grown" replaced with "remains strong" |
| Public Space | Introduction | Introduction | Line 2812: change bottom bay to estuarine waters; Shellfishing acreage isn't determined by bottom measurement | RI DEM Office of Water Resources | "bay bottom" changed to "estuarine waters" |

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| Public Space | Introduction | Introduction | callout box: change to 2012-2023 (currently says 2025); 2024 and 2025 are not depicted in the box | RI DEM Office of Water Resources | 2025 changed to 2023 |
| Public Space | Introduction | Introduction | Line 2831-2836: There are several ways RIDEM publicizes these event, social media/website/press releases, see comment 96 below on shellfishing (Line 3324-3226) | RI DEM Office of Water Resources | added "RIDEM Office of Water Resources publicizes shellfish closures in near real-time through web postings, recorded message hotline, press releases, and email." |
| Public Space | Introduction | Introduction | Table: Environmental Health Alerts: Publicize early public alert and incident reporting systems for unsafe water conditions and shellfish closures, and develop multilingual public education campaigns to reduce exposure to environmental health risks.; DEM-OWR lists shellfish closures in near real-time. Shellfish area closures are presently publicized through 1) online web posting (ri dem/shellfish), a 24/7 recorded message hotline (401-222-2900), and a RI shellfish closure listserve that has approximately 400 members. Unclear how this is not considered publicized. The point about multilingual is valid. | RI DEM Office of Water Resources | added clarification above that RIDEM OWR currently has near real-time public shellfish closure noticing. However, the Action also relates more broadly to coordinated public alerts and incident reporting for other public health risks such as HABs, sewage spills, and toxins in finfish. |
| Public Space | Introduction | Introduction | If possible, also mention that dams without portage create significant barriers to aquatic recreation. And for resiliency concerns, the expansion of aquatic invasives such as water chestnut also often prohibits recreation on flatwater ponds. Happy to share photos! | Blackstone Watershed Collaborative | Added reference to portage in Action Public Spaces-1.2: Public Access Protection. Added reference to aquatic invasive plants in Resiliency Considerations section of the Action Plan introduction. |
| Public Space | New Public Access Action | New Public Access Action | Plain Language suggestion: Create more places for people to connect with nature, such as parks and trails. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Public Space | New Public Access Action | New Public Access Action | Line 2896: see exploreri.org | RI DEM Office of Water Resources | NBEP will add ExploreRI as a related resource. |
| Public Space | New Public Access Action | New Public Access Action | Add a Potential Project to complete the Blackstone River Bikeway/Greenway from Worcester to Providence. This project needs more emphasis and a stronger role in route planning, right-of-way acquisition, funding and construction by both the MA DCR and the National Park Service. | Blackstone River Watershed Association | added "Complete the Blackstone River Bikeway/Greenway from Worcester to Providence." as a Potential Project; added National Park Service as an Implementing Partner. |
| Public Space | New Public Access Action | New Public Access Action | Blackstone Watershed Collaborative is listed twice in the Implementing Partners list - perhaps you meant Blackstone River Watershed Council? | Blackstone Watershed Collaborative | Changed second mention to Blackstone River Watershed Council. |
| Public Space | Public Access Protection Action | Public Access Protection Action | Plain Language suggestion: Safeguard existing spaces like parks and beaches so they remain available for everyone. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Public Space | Public Access Protection Action | Public Access Protection Action | Line 2975: Should note that there are pending legal actions against the 2023 Shoreline Access Law | RI DEM Office of Water Resources | added "... , though there are pending legal action against the 2023 Shoreline Access Law." |
| Public Space | Public Access Protection Action | Public Access Protection Action | Line 2981-2982: Should be clear that RI CRMC is only state designation of public access points | RI DEM Office of Water Resources | Replaced "State" with "Rhode Island Coastal Resources Management Council (RICRMC)" |
| Public Space | Public Access Protection Action | Public Access Protection Action | Line 3006-3008: Should note that there are pending legal actions against the 2023 Shoreline Access Law | RI DEM Office of Water Resources | change no longer relevant as the Climate Change section was deleted |
| Public Space | Public Access Management Action | Public Access Management Action | Plain Language suggestion: Ensure public areas are well-maintained and enjoyable for long-term use. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Public Space | Personal Pollution Prevention Action | N/A (Action Removed) | Personal Pollution Prevention At first, we didn't understand what "Personal Pollution Prevention" meant until we read more into that section. We recommend breaking it down into smaller sub-sections/categories to capture what we're looking for; e.g., fertilizer application limits, pet-waste removal, septic system maintenance requirements, etc. | Save The Bay | The Personal Pollution Reduction Action has been deleted; content has been moved to relevant Actions. |
| Public Space | Personal Pollution Prevention Action | N/A (Action Removed) | Line 3139: add in definition of personal pollution; This section is unclear on what is considered personal pollution. Topics range from stormwater to septic to trash. Consider whether this section is needed or whether the content should be integrated into earlier sections. If keepingit here, then perhaps give clearer emphasis to keeping public spaces clean. | RI DEM Office of Water Resources | The Personal Pollution Reduction Action has been deleted; content has been moved to relevant Actions. |
| Public Space | Personal Pollution Prevention Action | N/A (Action Removed) | Line 3148: Revise to be more precise - what is meant by more? Pollutant loadings or association with impairments. | RI DEM Office of Water Resources | The Personal Pollution Reduction Action has been deleted; content has been moved to relevant Actions. |

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| Public Space | Personal Pollution Prevention Action | N/A (Action Removed) | Line 3166-3167: Not clear how this related to stormwater/trash personal pollution focus of this section. RI is a no discharge state, so boaters are required to pump out/not dump. If keeping this, reword to simply say marina operators and others that operate pump-out facilities to service boaters. | RI DEM Office of Water Resources | The Personal Pollution Reduction Action has been deleted; content has been moved to relevant Actions. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Action Description: This section currently focuses on seafood and water. There may be an opportunity to also consider areas with sediment with elevated contaminant concentrations as priorities as well. | EPA Region 1 | NBEP appreciates the suggestion and agrees that alerting resource users to the presence of contaminated sediments could benefit public health. However, at the present time, NBEP does not see a clear pathway for consistent notifications. As a first step, see Habitat-3.1: Aquatic Connectivity for a potential project to synthesize existing information about contaminated sediments. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Plain Language suggestion: Inform people about risks in outdoor areas, such as unsafe swimming conditions or pollution. | Save The Bay | Acknowledged with appreciation. NBEP has reviewed the language of each Action and made edits where appropriate. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Line 3224-3226: same as comment for page 108 (above) – already several, near real-time shellfish closure notification systems in use. (Line 2831-2836) | RI DEM Office of Water Resources | Shellfish closure notification systems have been noted in the final draft. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Line 3244; Change the 2nd sentence to read…"Except for the Narragansett Bay Commission's Combined Sewer Overflow (CSO) Alarm Map, which is required by their RIPDES permit, …" | RI DEM Office of Water Resources | added text and new acronym |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Line 3251: RIDEM/RIDOH issue advisories for affected waterbodies in RI. Saying organizations makes it sound like watershed groups. | RI DEM Office of Water Resources | repalced "Organizations" with RIDEM and RIDOH |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Line 3271: Replace wastewater with combined sewage system; suggest you change "will lead " to "are likely to lead to " and then use "may lead to associated.. | RI DEM Office of Water Resources | change made to the new Chapter level Resiliency paragraph, since the Action level Climate Change section was deleted |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Massachusetts and Connecticut, but not Rhode Island, have legal requirements for public notification when untreated sewage flows into State waters. Except for the Narragansett Bay Commission's Combined Sewer Overflow Alarm Map, which is required by their ~~Point~~ Pollutant Discharge Elimination System (RIPDES) permit, Rhode Island Combined Sewer System (CSS) operators do not operate online overflow notification systems. In RI, wastewater facilities are required to report sewer system overflows to both DEM and EPA. | RI DEM Office of Water Resources | Text edited. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | Current wording of the paragraph in the comment above implies that there are more CSS operators in RI other than the Narragansett Bay Commission and the City of Newport. Recommend revising. | RI DEM Office of Water Resources | Text revised to read: In Rhode Island, the Narragansett Bay Commission operates an online Combined Sewer Overflow (CSO) Alarm Map, as required by their Pollutant Discharge Elimination System (RIPDES) permit. The City of Newport, which has one CSO discharge, does not operate an online overflow notification system. |
| Public Space | Environmental Health Alerts Action | Environmental Health Alerts Action | RIDOH guidance for freshwater fish consumption is more nuanced than what is written in this Action. Also as PFAS testing of fish has evolved, the guidance on eating stocked fish is also becoming more nuanced. Consider language more like: State Departments of Health provide recommendations for restricting fish consumption, especially for at risk groups. Both Massachusetts and RI also issue advisories for specific waterbodies when warranted by available data. | RI DEM Office of Water Resources | NBEP plans to clarify this recommendation with RIDOH; at least one resource on the RIDOH website recommend zero consumption of freshwater fish other than stocked trout for all groups. NBEP will edit the language in the Action as suggested. |
| Acronyms | Acronyms | Acronyms | Suggest abbreviating Massachusetts Executive Office of Energy and Environmental Affairs to "MA EOEEA" instead of "MAEOEEA". | MassDEP | Changed throughout document. |
| Acronyms | Acronyms | Acronyms | Remove acronym for "DER" and instead use "Mass DER" throughout. The Division of Fisheries and Wildlife (MassWildlife) is within the MA Department of Fish and Game and uses the abbreviation "MassWildlife." Suggestion to use "MA DER" to abbreviate Massachusetts Division of Ecological Restoration rather than "Massachusetts DER." | MassDEP | Edited as suggested throughout document. |
| Acronyms | Acronyms | Acronyms | MA DER is listed twice, remove "DER Massachusetts Department of Environmental Restoration | Massachusetts Division of Ecological Restoration | Edited. |
| Acronyms | Acronyms | Acronyms | Change "Massachusetts DER" to "MA DER" | Massachusetts Division of Ecological Restoration | Edited. |
| Acronyms | Acronyms | Acronyms | It looks like MA CZM is also listed twice | Massachusetts Division of Ecological Restoration | Verified one mention of MA CZM. |

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| General | General Comment | General Comment | Replace CCMP Update to CCMP Revision trhoughout | EPA Region 1 | Edited throughout. |
| General | General Comment | General Comment | Intro (about Naragansett Bay Watershed) I understand why they list Providence, Fall River, and Taunton as the key EJ areas; why not include Woonsocket and Worcester? | EPA Region 1 | added Woonsocket and Worcester to list of urban areas impacted by flooding |
| General | General Comment | General Comment | It would be helpful to have a clear and upfront discussion of how the CCMP priorities drive the annual workplans. That would make the timelines and budget estimates more real. | EPA Region 1 | We have included a description of NBEP's annual workplan process in the document introduction under "Supporting Documents." |
| General | General Comment | General Comment | The URI 41 North publication on p.19 is presented as the introduction to an action plan, but to me it doesn't seem very relevant. Maybe presenting it together with the subsequent material in the filled-out action plan format would show how actions will appear in the final CCMP. (nitpicky I know!!) | EPA Region 1 | NBEP no longer plans to reprint the 41N stories in full in the CCMP. Rather, NBEP will include a page in the document that describes the 41N issue and provides direct links to the stories. |
| General | General Comment | General Comment | Otherwise an impressive compilation, especially once they've filled in the actions, especially setting the targets which in my mind is the real substance of a CCMP. | EPA Region 1 | Acknowledged with appreciation. |
| General | General Comment | General Comment | Thank you for doing such an outstanding job on a very time intensive and very tedious project, the CCMP. Thank you too for the input opportunities as a Steering Committee Member along the way. One overriding concern I have, particularly with a new administration and congress, that is not as conservation and climate change friendly is that we need a CCMP that in each of its four plan areas of People, Water Quality, Habitat Protection and Restoration and Public Spaces we point out the economic impact of taking action or not taking action. I started to do this section by section and found it overpowering but I do believe we could highlight in climate change sections and in project outcomes. Meaning that we communicate in dollars were possible the economic impact of taking no action. For example in my world of fishing, not doing proper climate studies and stock assessments on striped bass spawning, fish stock movement (cold water fish moving out and warm water fish into the region), will have a direct economic impact on the recreational fishing in RI which contributes $412-million annually in economic sales impact. Striped bass represents a majority, more than 50 percent of all fishing trips. Another example, we are now all hearing about the cost of homeowners insurance rising nationwide. For example rates are quadrupling in Florida (in wildfire states too), many are not able to afford insurance, so this means no mortgages are granted and if no mortgages are being granted the real estate market collapses and thus the start of a downward spiral effect. Economically impacting every American homeowner as climate impacts will affect us all i.e. sea level rise in the northeast, etc. The point is if we do not point out how climate impacts us economically many will not believe it is worth investing in. Our science should relate what the economic impact, what the consequences will be economically for individuals, communities towns, states, regions and our watersheds. This is a tough nut to crack, and I am just starting to draw correlations between climate impacts, fishing and economic impacts that are occurring or will likely occur in the further. It is difficult to do because cost analysis like this have hot been done much before but if we are to survive in this political climate and for the next ten years of the plan, I believe we should be prepared to address the economic impact of our work so that leaders and the people in our states understand the economic and other detrimental impacts of not being conservation minded. Happy to help in any way I can. Mabe, we work this into every project when appropriate but draft a section that relates the economic consequences that are | Captain Dave Monti, No Fluke Fishing Charters | Acknowledged with appreciation. NBEP intends to develop an economic indicator for the 2027 update to the Status and Trends Report for the Narragansett Bay Region that we hope will emphasize the economic benefits of watershed and Bay restoration. We also agree that we should highlight economic impacts of our work - and the costs of not pursuing ecological restoration - more regularly. |
| General | General Comment | General Comment | Support for nonprofit capacity building/unrestricted funding is critical to trust-based, equitable grant making and environmental justice. Please continue championing capacity building support! | Groundwork Southcoast | Acknowledged with appreciation. |

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| General | General Comment | General Comment | I hate to say this, but I get the impression that none of your p;anwill be implemented under a Trump administration. I seriously expect anything to do with climate and justice to be eliminated from the federal government and that includes programs like this. I like most of what is in your plan, but seriously doubt any of it will survive. Can you imagine a Trump administration allowing climate planning or working with native and EJ communities? Have you started to plan for how to work in a new racist , fascist regime? Have you imagined your work under an anti climate attitude from the administration? How do you work when your boss in EPA and other federal agencies are fascists and climate deniers? What is your plan for forward motion when the fascists rule and fire everyone who believes in science and community? Your comment period ends on January 15. 5 days later your boss gets fired. Those of us in the NGO community will continue to work, but do you have any inkling as to whether you will be allowed to implement any of it? Greg Gerritt Friends of the Moshassuck Providence RI | Friends of the Moshassuck | Acknowledged. |
| General | General Comment | General Comment | Implementation Specificity Timeline: The document mentions general timelines (e.g., short-term, medium-term, long-term), providing more specific deadlines for each initiative could improve accountability. | Save The Bay | Acknowledged; however, the multi-partner nature of the CCMP precludes more timeline specificity. The timeline included in each Action indicates when NBEP intends to initiate activity. |
| General | General Comment | General Comment | Implementation Specificity Timeline: Key Performance Indicators (KPIs): Some actions could benefit from more precise metrics to track progress and measure success over time. | Save The Bay | Acknowledged; NBEP intends to track implementation of Potential Projects and Outputs for each Action and connect to State of the Bay Indicators when appropriate. |
| General | General Comment | General Comment | General Feedback: Save The Bay appreciates the opportunity to review the Narragansett Bay Estuary Program (NBEP)’s 2025 Update to the Comprehensive Conservation and Management Plan (CCMP) for the Narragansett Bay Region. Overall, we found this document to be incredibly comprehensive and we are eager to collaborate with NBEP, local, regional, and federal partners to implement the CCMP in the coming years. Two major recommendations we have include: 1) Reduce jargon and increase clarity of language throughout, and 2) Increase specificity of targeted audiences for outreach/education engagement, i.e. not just the general public, but how to innovatively engage diverse audiences (like businesses, business sectors, etc.). | Save The Bay | Acknowledged with appreciation. |
| General | General Comment | General Comment | Thank you for your consideration. I have spent many days and nights Wide awake thinking about Narragansett Bay. Your water ecosystem in that area is so huge and vast there’s really no one thing that you can do directly to affect it because of the whole ecosystem affecting that area, especially the way that whole sound and all of that stuff is set up over there. The truth be told there is one thing that can be done. It will not fix things, but it will make things a bit better long-term, and our ocean may go a little longer before it collapses you guys got a to find something other than the suntan lotions. There’s gonna have to be some kind of regulation that that addresses the suntan lotion issue. We have to find a way to stop people who are using kinds that are toxic to the ocean. Majority of the suntan lotions that are being used are very, very toxic to the ocean. You can do whatever watershed project you wanna do as long as that problem persists you will always have this problem and will get worse. Love the idea though and thank you for asking. Just stop the bad lotions. Get them banded. It is a major issue. Best human possible solution longterm and least expensive also | Marcus Porter | Acknowledged. |
| General | General Comment | General Comment | This is a thorough, well written draft document! The watershed planning principles and community driven planning should strive for meaningful and BROAD community engagement. This should stress that lcoal climate policy be more interconnected and extend beyond limitations within a 'hazard mit' plan a strong case and plan should be made for knowledge gaps at all levels and sustainable land use policies and decisions. This cannot be emphasized enough. Local and State land use decisions and policies must be more thoroughly integrated into your important work. Again, very impressive CCMP draft-thank you! | Maria Mack - South Kingstown Planning board Chair, RISCC Chair | Acknowledged with appreciation. |

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| General | General Comment | General Comment | Under water quality improvement there should be an action to address contaminated sediments throughout the watershed. This would include the main stem of the Blackstone River, particularly upstream from impoundments. We need more data as to what toxic and hazardous materials are in the sediments and then a plan to address the problem, particularly as dams are removed and the river becomes more free flowing. Toxic sediments are mentioned under Aquatic Connectivity, but we are proposing a comprehensive assessment of the problem and then projects to remove the sediments as part of dam removal projects. Secondly, call for the removal of low head hydropower facilities on the Blackstone River. These plants produce a miniscule amount of power and the impacts of continuing to have dams on the river just to generate a small amount of electricity makes little sense. Restoration of aquatic connectivity and safer recreational boating is far more important for the future of the river and the people who enjoy it. | Blackstone River Watershed Association | NBEP appreciates these suggestions. We have added a significant section about sediment contamination to the Aquatic Connectivity Action and included the sediment assessment as a potential project, with emphasis on the Blackstone River. |