

APPENDIX B

**Public Responsiveness
Document**

BARNEGAT BAY ESTUARY PROGRAM

PUBLIC RESPONSIVENESS DOCUMENT

TO THE DRAFT

COMPREHENSIVE CONSERVATION

AND MANAGEMENT PLAN

August 31, 2001



Barnegat Bay hunting sneakbox.

PHOTO COURTESY OF THE TUCKERTON SEAPORT, A PROJECT OF THE BARNEGAT BAY DECOY AND BAYMEN'S MUSEUM, INC.



The Menhaden Fish Factory, Crab Island, Little Egg Harbor, circa 1970.
PHOTO COURTESY TUCKERTON SEAPORT, A PROJECT OF THE BARNEGAT BAY DECOY AND BAYMEN'S MUSEUM, INC.

INTRODUCTION

The Comprehensive Conservation and Management Plan (CCMP) for the Barnegat Bay National Estuary Program (BBNEP) is the culmination of an interagency planning process which was begun on April 16, 1996, as part of the National Estuary Program (NEP). The NEP is authorized by Section 320 of the Clean Water Act (CWA) Amendments of 1987, and has as its general goals the protection and improvement of water quality and the enhancement of living resources in estuaries of national significance. Participation in the BBNEP planning process included federal, state, county, and local agencies, commercial interests, academia, and the interested public. The BBNEP Draft Final CCMP has undergone a period of public review, and comments are being incorporated into a Final CCMP for submittal to, and approval by, the U.S. Environmental Protection Agency (USEPA) Administrator and the Governor of New Jersey. Upon final approval, the CCMP will pass from the preliminary planning phase to active implementation under a continuing committee structure.

The Draft CCMP for BBNEP was released for public review at a BBNEP Policy Committee Meeting held at the NJ Museum of Boating in Point Pleasant, New Jersey, on May 16, 2000. Copies of the draft document were subsequently made available at the annual Barnegat Bay National Festival on May 20, 2000. During the same week, 120,000 copies of a multi-page newspaper supplement that summarized the content of the CCMP were distributed in the Sunday, May 14, 2000, issue of the Ocean County edition of the *Asbury Park Press*. The newspaper supplement included a mail-in comment box for those interested in making comments to the CCMP.

Distribution of the Draft CCMP was made to the following:

- Members of all committees of the BBNEP Management Conference;
- Ocean County offices;
- Ocean County municipal offices and four municipalities in Monmouth County that lie within the Barnegat Bay watershed;
- All 20 branches of the Ocean County Library, and two branches of the Monmouth County Library;
- Press offices within Ocean County;
- The interested public, upon request;
- The BBNEP Web site (<http://www.bbnep.org>);
- The Ocean County Mayors Association; and
- Federal and state legislators with districts within the watershed.

Following public release of the BBNEP Draft CCMP, six public meetings, three each in the afternoon and evening, were scheduled at three venues placed throughout Ocean County, New Jersey, to solicit comments to the draft document. The meeting schedule follows:

- Municipal Building, Stafford Township, Manahawkin, New Jersey - June 6, 2000;
- Municipal Building, Jackson Township, Jackson, New Jersey- June 8, 2000;
- Municipal Building, Brick Township, Brick, New Jersey - June 14, 2000.

A total of 46 people attended the meetings and commented to the draft document. Mail-in comments to the Draft CCMP were accepted until July 17, 2000, and 21 mail-in comments were received.

PUBLIC RESPONSE

The following pages summarize the comments received on the Draft CCMP along with the BBNEP's responses. Appropriate revisions to the draft document were made in light of these comments and are reflected in the Final CCMP. Comments and responses are organized according to general topics as follows:

1. General Comments/Introductory Chapters;
 2. Governmental Support;
 3. Water Quality/Water Supply (Chapter 5);
 4. Habitat and Living Resources (Chapter 6);
 5. Human Activities and Competing Uses (Chapter 7);
 6. Public Outreach and Education (Chapter 8).
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1. GENERAL COMMENTS/INTRODUCTORY CHAPTERS

Comment: Why was Barnegat Bay chosen for the NEP?

Response: Barnegat Bay meets the definition of an estuary of national significance that is threatened with declining water quality and ecological health. Strong local support and a nomination request by the Governor in 1995 elevated the problems of the bay to the attention of USEPA. Under the authority of Section 320 of the CWA Amendments of 1987, Barnegat Bay was accepted into the NEP and a Management Conference was convened to develop a CCMP.

Comment: A person inquired about the total cost of implementing the Program.

Response: The individual action items state the estimated cost for implementation. The Draft CCMP did not include costs for all of the action items, but the final document lays out a more comprehensive estimate for costs, which total more than \$9 million.

Comment: One commenter disapproved of the consensus process used in this Program, citing it as undemocratic since a single interest could stop an issue from being brought to resolution.

Response: The commenter, who did not participate in the BBNEP Management Conference, misunderstands the concept of consensus building. It is important to engage all stakeholders in a discussion to address a particular issue in order to arrive at a mutually agreeable resolution. Not all stakeholders will have a similar point of view on a particular issue or problem, but through the consensus process common ground can be identified, which serves as the basis for an agreement that all can support and facilitate action. The notion that a single interest can hold up resolution to an issue is a misreading of the consensus process, and suggests that the process itself is misapplied. Now as we all proceed beyond the command and control mode of regulatory enforcement to continue our drive towards clean water and a productive estuary, it becomes all the more important to engage diverse interests in arriving at environmental solutions that satisfy a multitude of purposes and outlooks.

Comment: One letter provided specific comments to passages in the introductory chapters of the CCMP:

1. The Mission Statement should include as part of its education focus the ecology and biological resources of the bay and its watershed.
2. Chapter 1 should acknowledge the importance of recreational fishing as an economic mainstay of Barnegat Bay.
3. Chapter 1 should elaborate on the value of estuaries in order to demonstrate the importance of this Program.

Response: Appropriate revisions have been made in the Final CCMP.

2. GOVERNMENTAL SUPPORT

Comment: Legislators in attendance inquired as to the legislative needs of the Program. In a related vein, a question arose regarding the financial limitations of the Program.

Response: Governmental support at every level is needed to help implement the CCMP, including sustained commitments of financial assistance. A number of options to develop financial commitments are being pursued, including funding assistance programs at all government levels, and are detailed in the document. No new regulatory approaches are being proposed at present, but regulatory options are being actively considered to address identified problems related to such water-related activities as boating and personal watercraft use.

Comment: One commenter was concerned that the various levels of government will not reach resolution to proceed on implementing the action items.

Response: The Management Conference of the BBNEP includes all of the interested stakeholders within the watershed, including the agencies within all levels of government: federal, state, county, and local. Regulatory programs which mandate action are already being implemented, or are being initiated, to fully protect and conserve water quality and other environmental resources. It will require a cooperative approach among the various levels of government to take further action. The consensus approach used within the Management Conference has produced a suite of actions in the CCMP whereby governmental agencies will take the necessary steps outside the regulatory arena to achieve Program goals. As such actions are taken and the successes of those actions documented, reaching agreement on taking other action steps will be easier to achieve.

Comment: Two comments questioned New Jersey's commitment and level of support to the Program.

Response: In order for the CCMP to be approved by the Administrator of USEPA, the Governor of New Jersey must provide documentation of the state's support for implementation of the Plan. New Jersey has been an active participant in the Program, starting with the formal submittal of the nomination of Barnegat Bay to the NEP. New Jersey has ensured the commitment of 25 percent non-federal matching funds to the development of the CCMP, and will have available continuing funding sources that may be used to support CCMP implementation actions. The NJ Department of Environmental Protection (NJDEP) is coordinating the CCMP with its watershed management plan for the Barnegat Bay watershed, which is identified as Watershed Management Area #13, thus integrating the CCMP into the state's administrative structure for environmental protection.

Comment: Several comments centered on the role of Ocean County as lead agency in the CCMP implementation structure. One commenter thought that Ocean County is not the appropriate agency, while others supported Ocean County in the lead role.

Response: The Barnegat Bay estuary and watershed are located primarily in Ocean County. The Management Conference considered a number of options and concluded that, on balance, Ocean County is best situated to track and oversee the implementation of CCMP actions. This decision does not put the burden of action implementation or enforcement directly on Ocean County; rather, the County will monitor the progress of the Program as individual actions are implemented by the specifically identified lead agencies. Recognizing the dominant role to be played by County agencies and local government, not to mention giving credit to the ongoing commitment of the County to the Program, the Management Conference agreed that Ocean County, as overall lead agency within the implementation management structure, would offer the best likelihood for success for the Program. Ocean County has been an active player in the development of the CCMP from the onset of the Program. The County has provided free office space for the Program and has acted on a resolution to provide substantial funding (\$250,000) each year for implementation of the Plan.

PUBLIC RESPONSE

Comment: Several people questioned the commitment of local governments to the Plan. In their opinion, the lure of increased tax revenues makes regulating development difficult, and the influence of the development community often outweighs other interests.

Response: The Management Conference has taken steps to increase the participation of local governments in this Program. Other actions are cited within the Action Plans to increase local government outreach and participation. In New Jersey, development is regulated by the Municipal Land Use Law (MLUL) (*NJSA 40:550D-1, et seq.*), which allocates planning and regulatory authority to municipalities. The MLUL establishes the broad context and procedural framework for how local governments plan for the future. Several planning tools related to this authority are proposed to help local governments better evaluate the economic and social effects of development, including the cross-acceptance process of the Ocean County Master Plan, and a build-out analysis showing the effect of full development under current municipal land use zoning. The Management Conference embraces all stakeholder interests in the estuary and watershed, and works through the consensus process to reach resolution that is acceptable to all concerned. During Plan implementation, all of these same interests will continue to be heard, avoiding undo influence by any single interest or group of interests.

Comment: A specific recommendation to ensure local government action was to add mandatory requirements for environmental measures to municipal land use plans.

Response: Mandatory elements for municipal master plans are specified as part of the Municipal Land Use Law (MLUL). One of the purposes of the MLUL is to enhance preservation of the environment. Adding more detailed mandatory components to incorporate environmental considerations would require action by the state legislature. The Management Conference will take this comment under consideration, and refer any recommendations through the appropriate state channels.

3. WATER QUALITY/WATER SUPPLY (CHAPTER 5)

Comment: Two comments noted the high turbidity of Barnegat Bay waters, particularly during the summertime. They recommended that additional inlets be cut through the barrier island chain to increase flushing of the bay waters to the ocean.

Response: Increasing the flushing of Barnegat Bay is one way to address the water quality problems that are being experienced there, but opening new inlets is a drastic measure that would have a multitude of environmental and economic effects, and it would necessitate a detailed feasibility study before it could be considered a viable option.

Much of the water quality degradation in Barnegat Bay derives from nonpoint source (NPS) pollution draining from the watershed, including excess nutrients that stimulate summertime algae concentrations. Reducing this nutrient input into the bay, as many of the water quality actions cited in the CCMP are meant to do, will help to alleviate the cause of summer water quality degradation and improve water clarity in the bay without drastically changing the existing hydrological conditions of the bay. The Management Conference believes that this approach, reducing the nutrient load to the bay, is the better immediate approach for addressing Barnegat Bay's water quality problems.

Comment: One commenter suggested that the Program address the issue of brown tide, visible blooms of microscopic algae that harm molluscan shellfish and reduce water clarity to the detriment of eelgrass beds in Barnegat Bay.

Response: Brown tide has been identified as a project in the Program's unfinished agenda (Chapter 11). Brown tide is a fairly recent phenomenon in the bays of the Mid-Atlantic region, and studies to date have failed to fully define the how and why of problem algal bloom occurrences. The Science and Technical Advisory Committee (STAC) of BBNEP recommends a course of action to collect long-term information on brown tide blooms to help reach a better understanding of the factors that lead to such blooms and to help suggest ways that they may be mitigated, and the state of New Jersey is backing up this proposal with a commitment for monitoring.

Comment: One person questioned the effectiveness of the new stormwater management regulations.

Response: The new Phase II Stormwater Regulations promulgated by USEPA will address contaminated discharges from stormwater systems not already covered under existing point-source discharge regulations and will apply to many, if not most, municipalities within Ocean County. Regulation of point source discharges, primarily from municipal sanitary sewer systems, has shown good performance in Ocean County. There has been a demonstrable improvement in bay water quality since the 1980s when Ocean County regionalized its municipal sanitary sewer systems and discharged the treated wastewater effluent through ocean outfalls. The main inputs of contaminants that lead to water quality degradation in the bay now come from stormwater and unregulated nonpoint sources. The stormwater regulations will address these inputs and further reduce the contaminant load to the bay.

Comment: One local official who handles stormwater management for his township expressed frustration that there were inconsistencies in applying stormwater rules between the CAFRA area (state coastal zone boundary) and Pinelands National Reserve and Pinelands Protection Area zone (inland and upper watershed region); one jurisdiction specifies one set of standards while the other specifies a different set.

Response: It's true that the two regulatory areas, which both occur in about a dozen of Ocean County's municipalities, have somewhat different rules for stormwater management, but these rules are set in law. To resolve any contradictory elements in these rules would require action by the state legislature. The Management Conference will follow up on this comment to identify any particular problems in the implementation of these regulations, and refer them to the state as appropriate.

Comment: Comments were raised that the Program should address siltation in the watershed. Another person commented that the bay was losing open water area due to emergent vegetative growth.

Response: The Program had not previously identified siltation as a problem in the watershed, and has not developed an action specifically addressing it. Indirectly, siltation and sediments will be controlled through actions taken to implement best management practices (BMPs) for stormwater control. Sedimentation is often a localized problem and can be addressed with localized remedies. The Program can address such problems as they are identified during Plan implementation.

PUBLIC RESPONSE

Comment: One commenter questioned how the Program was addressing flooding in low-lying areas. He suggested that engaging local municipalities in the flooding aspects of stormwater flow would facilitate their involvement in other areas of water resources management.

Response: The best way to avoid flooding impacts is to protect floodplains from development through watershed-based planning. Onsite retention of stormwater in developed areas can also reduce flooding impacts to areas downstream. The Program will explore all avenues to ensure cooperative participation by all stakeholders within the Barnegat Bay watershed. At present, groundwater depletion due to overpumping by a number of municipalities appears to be an opportunity to engage local governments in Plan actions that will also address specific local concerns.

Comment: A number of concerns were raised with regard to toxic pollution in Barnegat Bay, particularly with regard to boat fuel and fuel additives, such as MTBE.

Response: Toxic pollution has not been identified as a major problem in Barnegat Bay, but it is also an issue that is poorly studied. Monitoring projects to sample toxic pollution are being developed in order to close existing data gaps, and they will help the Program better understand the relative importance of this issue and the need to take action. Currently, USEPA Region 2 is conducting a synoptic monitoring study of Barnegat Bay (R-EMAP), partly directed at characterizing the Bay's waters in terms of specific toxic contaminants.

Comment: One commenter asked about the Oyster Creek nuclear power plant and its overall effect on the Bay.

Response: Oyster Creek is the largest point-source discharger in Barnegat Bay, and is regulated through its state discharge permit. The largest impact is the thermal discharge of its cooling water stream. The power plant is required to submit an annual monitoring report documenting that the plant is in compliance with its permit requirements. The CCMP includes an action whereby the Program Office will review the annual report in order to keep up-to-date on the status of the plant's emissions.

Comment: Multiple comments touched on the issue of residential landscaping and paving, requesting information, promoting public education, questioning public acceptance of environmentally preferred alternatives, and promoting stricter regulations on pesticides.

Response: The CCMP includes a number of actions that promote public education, awareness, and participation in reducing the risks of NPS pollution related to pesticides and fertilizers used in home landscaping. As public awareness grows, and as demonstration projects show acceptable alternatives to intensively manicured lawns, the Program believes that the impacts of residential runoff carrying nutrients and pesticides can be reduced.

Comment: Several people identified trash and floatable litter as a major problem in beach communities. Others cited dog litter as a persistent problem.

Response: Individual beach municipalities have addressed these problems through local ordinances that prohibit discharge of these kinds of waste in the storm sewers, and prescribe appropriate disposal practices and trash pick-up schedules to accommodate the transient summer population. Volunteer groups in areas such as Long Beach Island sponsor periodic trash cleanups to improve the aesthetic appearance of their local communities.

The Management Conference believes this kind of local activism is the appropriate response to these sources of pollution, and will continue to facilitate adoption of these measures by municipalities that do not already have them.

Comment: One comment suggested adding another pumpout boat and pumpout stations at marinas to reduce boat sewage discharged to Barnegat Bay.

Response: The Program has been active from the outset in improving sewage pumpout capability in Barnegat Bay. Through the Clean Vessel Act and other funding sources a number of pumpout stations have been installed and Barnegat Bay's first pumpout boat was commissioned. These facilities have been operating for about three years, and additional facilities are being planned. In addition, New Jersey has submitted a No Discharge Zone application for Barnegat Bay to the EPA that, if approved, would prohibit direct discharge of sewage of any kind into Barnegat Bay. These initiatives are described in a number of actions within Chapter 5 of the CCMP.

4. HABITAT AND LIVING RESOURCES (CHAPTER 6)

Comment: Two comments expressed concern regarding changing practices on mosquito ditching in tidal wetlands to control health and aesthetic problems.

Response: Action 6.4 promotes the management of the mosquito problem using the Open Marsh Water Management (OMWM) procedure. Instead of using a static grid system of mosquito ditches that is overlain on a tidal marsh, OMWM involves ditching that follows the individual contours of the marsh area, providing access throughout the marsh to mosquito-eating fish while reducing impacts to the marsh that result from straight ditching.

Comment: Several comments remarked that the CCMP fails to address the most significant problem in the watershed, namely the rapid population increase in Ocean County and its associated development. Without restrictions on development, no environmental measures will be able to reverse the trends of continuing environmental degradation.

Response: The Management Conference of the BBNEP includes viewpoints of all interested stakeholders within the watershed. The comment expresses one viewpoint that is represented in the Management Conference. It must also be understood that land use planning, a tool used to regulate development density, is primarily a responsibility of local governments via the MLUL and the Management Conference cannot override local government authority. It is through actions in the CCMP and coordinating with local government (to secure environmental protection within the scope of their land use planning authority), that the Management Conference can play a substantial role in addressing development impacts.

The Program has been conducting an analysis of the full build-out of Ocean County under the existing Ocean County Master Plan. This analysis is helping to forecast the physical and environmental condition of Ocean County under the full build-out scenario. With this understanding, Ocean County and its municipalities will be better able to foresee their future situation with increased development and the attendant environmental impacts. This knowledge will help Ocean County and the municipalities appreciate the tradeoffs of additional development and to plan more intelligently for the kind of future that they desire.

PUBLIC RESPONSE

5. HUMAN ACTIVITIES AND COMPETING USES (CHAPTER 7)

Comment: One person expressed a concern that the Program will result in excessive restrictions on the public's use of the bay and its resources.

Response: The purpose of the Program is not to place undue restrictions on the enjoyment of the bay; rather, the Program addresses identified problems that are generally recognized among the bay and watershed's various stakeholders. Only those actions that are necessary to alleviate an identified problem are being proposed as part of the Plan. Issues that have not been resolved among the competing interests will require further discussion before agreeable solutions are found. The large population and the differing constituencies that all want to make use of the bay's limited resources require prudent steps to ensure that the enjoyment of the bay is maximized among this divergent group.

Comment: Strong comments from several sources dwelt on the issue of personal watercraft (PWC) use in Barnegat Bay. They generally criticized the noise, environmental disturbance, and hazards to others that PWC can present. Suggestions for remedies included bans and zone restrictions for such craft, as well as stepped-up enforcement of regulations for vessel operation. Kettle Creek and Silver Bay, two semi-enclosed reaches in northern Barnegat Bay bordered by shoreline development, were two areas identified where the PWC problem is most acute.

Response: The Barnegat Bay Watershed Association (BBWA), now undergoing a transition to a non-profit foundation known as the Barnegat Bay Watershed and Estuary Foundation (BBWEF), early in the Program represented citizen interests and recognized PWC as a prime element of the issue of competing human uses. The BBWA conducted an interdisciplinary workshop of the PWC issue, and is making progress through consensus building in developing a satisfactory resolution. This deliberation will continue as the non-profit foundation participates in the implementation phase of this Program. It is well to note that legislative remedies are also under consideration at the state level in Trenton, New Jersey. Action 7.1 in Chapter 7 of the CCMP addresses this issue in detail. A conservation zone designation, targeted at PWC, for the Sedge Islands in Island Beach State Park appears to have been effective in reducing noise and disturbance impacts to sensitive coastal habitats.

Comment: A number of people commented on a general lack of enforcement of boating regulations, which magnifies the nuisance problem and the conflicts among water users. One person cited Florida as an example of good enforcement of boating regulations.

Response: Boating infractions or disturbances are often due to a lack of understanding by those who take part. A "Boater's Guide to Barnegat Bay" has been completed and helps to meet the public education and outreach goal of the Program. As stated in Action 7.2 of the CCMP, this guide will be part of an effort to ensure better boater behavior and better protection of the bay's water quality and natural resources. Enforcement of boating regulations is the responsibility of the New Jersey State Marine Police. New Jersey is committed to an adequate enforcement presence in its marine waters. As competing use problems are better defined and quantified, statewide measures can be applied that will extend benefits to the particular circumstances of Barnegat Bay.

6. PUBLIC OUTREACH AND EDUCATION (CHAPTER 8)

Comment: A number of participants voiced the need to continue funding public awareness efforts, and, considering the large seasonal population of visiting tourists, noted that these efforts should extend beyond the watershed boundaries of Barnegat Bay.

Response: The CCMP cites a number of actions that continue public outreach and education activities that began with the inception of the Program. The active participation of the NJDEP and Ocean County in this Program will facilitate spreading the message of watershed management and water quality protection beyond the watershed boundaries to all areas of New Jersey.

Comment: Two comments at the public meetings recommended using local cable TV as part of the Program's public outreach strategy.

Response: The BBNEP has explored all options in implementing its public outreach and education effort, including cable TV outlets. The Program will pursue this option whenever it is appropriate.

7. USEPA HEADQUARTERS COMMENTS

A revised CCMP was completed in October 2000, incorporating comments made in the public review period. USEPA Headquarters gave the revised document a preliminary review and submitted comments in December 2000. A subsequent revised CCMP was completed and approved by the Policy Committee in January 2001. The document was published with a date of February 2001, and given detailed review by USEPA Headquarters. Comments were submitted in April and July 2001. This final CCMP reflects the comprehensive response of the Barnegat Bay National Estuary Program to this series of iterative comments by USEPA Headquarters.

The following discussion summarizes the major comments and concerns expressed by USEPA Headquarters, and the responses of the Barnegat Bay Estuary Program to the revision of the CCMP.

CCMP Goals and Objectives

Comment: Action Plan Objectives are clearly stated but are not clearly related to individual action items. Most of the objectives lack measurable standards of progress.

Response: The CCMP has been significantly revamped to focus individual action items on the achievement of Program Goals and Objectives. Measurable standards for meeting goals and objectives are identified, and targeted milestones for incremental progress are identified where possible. See Tables 5-2, 6-2, 7-2, and 8-2 for a schematic relating indicators and measurable standards to applicable monitoring programs.

PUBLIC RESPONSE

Action Plans

Comment: The Action Plans lack prioritization, and many individual action items remain poorly defined. Many actions are missing important information, particularly the cost of implementation and identified funding sources. Many actions also appear to lack a sense of commitment.

Response: The Management Conference engaged in a widespread discussion to reach consensus on action priorities. This is reflected in a revised Section 4.3 (Action Plan Priorities) and Tables 4-1 through 4-4 in Chapter 4. Each of the Action Plan tables also includes a column denoting action item priority.

Poorly defined action items were revamped, deleted, or consolidated in order to strengthen the overall Action Plans. More specificity was added to each of the action items by providing cost estimates, time lines for implementation, potential sources of funding, and structured steps for action implementation. A greater number of action items now have firm commitments for implementation and/or secure funding sources. Actions that lack firm commitments are clearly identified as to their relative priority. No major elements of the Action Plans were eliminated in the revisions, and the Program believes that a more coherent presentation of its environmental goals and objectives is the result.

Monitoring Program Plan

Comment: The Monitoring Plan as presented is deficient and needs significant work. Identified monitoring programs should be more clearly presented, and the monitoring strategy should be linked to the objectives for each of the action plans.

Response: The Monitoring Plan was revised as much as possible to respond to USEPA Headquarters comments. The linkage of monitoring strategies to objectives is presented in Tables 5-2, 6-2, 7-2, and 8-2 of the Action Plan chapters. A first order priority for Program implementation is the scheduling of monitoring workshops to complete preparation of a final Monitoring Program Plan. One of these workshops is scheduled for October 2001. The Program believes this demonstrates a good faith effort to comply in full with Section 320 requirements.

Base Program Analysis

Comment: The Base Program Analysis presents an inventory of existing programs, but does not present an evaluation of program effectiveness or recommendations for addressing program gaps and expanding strengths.

Response: The Base Program Analysis has been revised to expand coverage of topic areas deemed deficient by USEPA Headquarters. See Appendix G for the revised presentation.

Finance Strategy

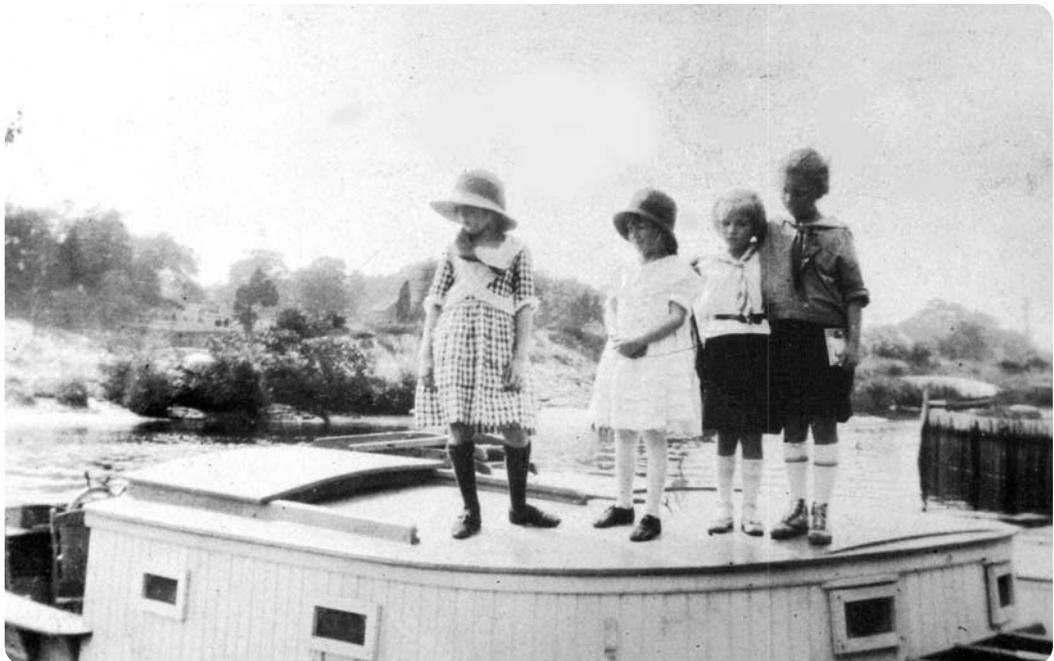
Comment: The CCMP identifies potential sources of funding, but does not link these sources to specific actions.

Response: Revisions to the final CCMP include stronger linkages between specific actions and sources of funding. In addition, Chapter 12 includes a more comprehensive discussion of the Program's Finance Strategy. The Program has also made progress in establishing a non-profit foundation to secure corporate and other sources of funding to support Program implementation. This entity is the Barnegat Bay Watershed and Estuary Foundation.

General Editing Comments

Comment: Many passages are unclear in presenting the rationale of the program, identifying priorities, and substantiating the importance of individual action items.

Response: Language revisions have been incorporated into the final CCMP in order to more clearly present the work of the Management Conference, the development of the Action Plans, and the goals and objectives of the Program.



*Children of Tuckerton Creek, PHOTO COURTESY OF TUCKERTON SEAPORT,
A PROJECT OF THE BARNEGAT BAY DECOY AND BAYMENS' MUSEUM, INC.*

We abuse land because we regard it
as a commodity belonging to us.
When we see land as a community
to which we belong,
we may begin to use it with love and respect.

--Aldo Leopold, (1887 - 1948) U.S. Forester
