

Comments received by STAC Members on Draft Revised CCMP

Section/Pg/Action	Comment
General comment	<p>This document uses both the terms resilient and sustainable (or forms of these terms, e.g., sustainability). Depending on the reader, program, state and so on, the meaning can vary. It may be worth considering defining these terms in Appendix A. From my perspective, sustainability is the ability to maintain a specific condition or level of health when exposure to chronic and/or targeted acute effectors or stressors. Resilience incorporates sustainability with a self-healing aspect. For example, a marsh has the potential to be resilient, while a groin or seawall can only have the potential to provide a sustainable condition. There are many more eloquent ways to say this, but these terms are related yet significantly different, and are often misused.</p>
General comment	<p>There are a number of Timeframe and Key Milestones that basically say “ongoing.” Examples are on Page 20. The key milestones provide a mechanism for evaluating Action progress, success, failure, etc. Ongoing generally describes the Timeframe, but offer nothing towards Milestones. There should be something more substantial or better defined. In situations where there is an “ongoing” plus other narrative (e.g., “On-going - goal of 4,175 acres restored”), it should be noted how much or a percentage of what has been accomplished so far, so it is clear where this revision of the CCMP is picking up. Also, unless the Timeframes and milestones are better defined, it become difficult to justify Cost, and sometimes Funding Sources. It is OK to complete an Action, and modify it on subsequent revisions. Actually, there are programmatic, strategic, and energetic benefits of setting a few clearly attainable (within 4-5 years) Actions in the CCMP. So it is suggested that real quantifiable milestones be provided for each Action.</p>
General comment	<p>There is an endless list of objectives and actions that could be devised for this document. I have seen this to be a trap in other CCMP development efforts. I am glad that this CCMP revision has developed into a manageable document that focuses on specific directions rather than trying to do everything. I am confident that this will help CIB and the rest of the partners realize greater success.</p>
Pg ii, Map of watershed	<p>Include North Arrow, Scale Bar, Legend, Label Inlets Label Ocean Figure labels go below / table labels go above recommend adding an extra data frame that includes a 'zoomed out' look at where watershed falls in the state ( a popout map)</p>
Page 1 paragraph 2	Provide reference. State of bays report?
Page 1 “Delaware Center for the Inland Bays Management Conference”	To my understanding, it is not the Center's management conference, but the Inland Bays NEP conference. Suggested remove “Center for the” so it reads “Delaware Inland Bays Management Conference”
Page 2, “The Center’s Scientific and Technical Advisory Committee (STAC)”	Same comment – it’s the NEP Inland Bays STAC - not specific to the Center.

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Page 3, The Evolution of the Delaware Inland Bays CCMP, first sentence in paragraph 1	Again - I believe this is meant for the entire partnership and not specific to the Center who implements the grant.
Page 3, Table 1 "Focus Areas"	You call these Core Elements throughout the document - you should use the same phrase for consistency
Page 4, paragraph 1	Can you provide any specific values from LU/LC that specifies the rate or loss or how much loss??
Page 7, "More than 500 people took the survey: 60% of respondents identified.."	Is this right? If so, you should provide an appendix or some figures/tables that show some of the data that you collected.
Page 7, Public and Stakeholder Input, paragraph 3	It important to note that during this time, the Center was working towards an update not a full revision. This should be discussed in the text.
Page 8, Acknowledgements, "Technical Advisory Workgroup"	Workgroup? I believe there was a CCMP workshop and a climate vulnerability assessment workshop, but I do not think that makes me a member of a workgroup.
Page 8, Technical Advisory member list	In the list of members of the technical advisory workgroup, both Scott Andres and Doug Janiec are listed as "STAC" while the others are affiliated with their work organizations and some of those individuals, including myself, are STAC members. Consider adding STAC affiliation with all those that this applies to or changing those two individuals titles to their work affiliation.
Page 10, State of the Inland Bays	can you provide any figures that show some of these trends? They would be good to reference throughout the text of the actions.
Page 11, Figure 3	You use the word "timeframe" in each action but timeline in the figure. Recommend aligning for consistency.
Page 12, Living with a Changing Climate	There is no reference to the EPA Climate Change Vulnerability Assessment you undertook. You should discuss that and how you have made your actions climate ready.
Page 12, Living with a Changing Climate	consider defining mitigation and adaptation so that the reader can clearly understand the difference between these two terms (or include in glossary at the end).
Page 12, second paragraph, "Other examples include implementing living shoreline projects (which will reduce wetland shoreline erosion), ..."	suggest "(which will reduce wetland <b>and/or</b> shoreline erosion)"
Page 12, Objective 1	consider adding "adapt" or "adaptation" to the title of this objective as it only references mitigation now but actions touch on both
Page 12, Objective 1, paragraph 1, "The localized impacts of climate change are still poorly understood by the public."	How do you know that? From survey results? If so, reference.
Page 13, Action 1, Timeframe & Key Milestones	Is there any goal of how many programs/projects? Will you be working on this annually?
Page 13, Action 1, Location (but can be said for all actions)	you use 'bay wide' throughout the entire action but do not reference what you mean by that. It could be interpreted as 'in water' only - do you mean the Delaware Inland Bays watershed? If so, define and/or use that instead of 'bay wide'
Page 13, Action 2, timeframe and key milestones	Is there a goal of how many pubs annual ?

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Page 13, Action 3, timeframe and key milestones	5-7 years of what? publication? signing? Recommend you use dates/years so is clear.
Page 14, Objective 2, first paragraph	Reference the research - was it DNREC who did this research?
Page 14, Objective 2, paragraph 3	Shouldn't this be in the other objective? This action seems to align with your action of having 40% muni with vulnerability assessments.
Page 15, Action 2	Impacts might be a better suited word choice alternative to effects.
Page 15, first paragraph under goal	Do you have LU/LC data that can be referenced to show the percentage of land in the watershed that is ag?
Page 15, paragraph 3 under Clean Waters	Why only 8 of the 10 practice? Why not track all 10?
Page 16, "One example of this is the Watershed Reforestation Plan for the Inland Bays."	Link [to the reforestation plan]
Page 16, "The CIB and partners plan to create similar operational plans for additional practices and plan to update the Reforestation Plan once fully implemented."	can you be more specific on what additional practices you plan to create operational plans for?
Page 16, Action 1	This sounds like it should be two separate action. One to track new partner engagement and one to track implementation of ag BMPs.
Page 17, Objective 2	There has been a noticeable amount of interest in technologies such as biochar and activated carbon, and others that could lend themselves to a category of innovative reuse and handling of manure. Can the opening descriptive paragraph of Objective 2 be amended slightly to better recognize these new and developing technologies?
Page 17 - Objective 2, Action 1 or 2	consider adding a goal to promote the use of the 4R nutrient stewardship approach (right time, right place, right rate, right source) to reduce nutrient losses from crop land
Page 17, Obj 2, Action 1, Sub-action 1a	why is STAC a support on this?
Page 17, Obj 2, Action 1, Sub-action 1b	again - why is stac a lead on this?
Page 19, Action 3, performance measure	How will this be tracked and captured to show progress?
Page 19, Action 4, performance measures	is this reported annually?
Page 20, Developed Landscape, 1 <sup>st</sup> paragraph	Point sources can be scalable. They can be major point sources, such as those that seem to be discussed in this paragraph, and those that are smaller. I suggest adding the qualifier of "major" point source to this paragraph to make it present more accurately.
Page 21, Objective 1	Consider adding an action on educating homeowners/private turf owners on the wise use of fertilizer.
Page 23, Action 2, performance measure	How will you track this metric? How will report out on progress
Page 23, Action 3, timeframe and key milestones	Provide years - 5-7 years is relative

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Page 24, Obj 2 Action 6	I notice STAC is listed as a lead for this item along with Sussex County. If you have additional details of the expectations of STAC for this item, please share them with me as soon as possible. I suspect this is an action the former Chair was involved with and perhaps should list DGS instead, with support from STAC?
Page 24, Obj 2, Action 6, performance measure	This is not measurable or trackable. Recommend "data collected on nutrient attenuation"
Page 24, Obj 2, Action 6, timeframe and key milestones	Change to specific year
Page 24, Action 7, timeframe and key milestones	same comment as before. Detail specific years
Page 24, Objective 3, first paragraph	Although not quite as severe as being observed in the northern counties, road salt (treatment) run-off is becoming an emerging concern. Is it worth at least mentioning this in the narrative somewhere, in case it becomes more an issue in the future? That way, the CCMP does not inadvertently close the door on this issue.
Page 24, Objective 3, first paragraph, "Stormwater is polluted runoff that"	stormwater is not necessarily polluted runoff - it is surface water from increases in precip/storms. Stormwater carries surface pollution.
Page 24, Action 1	what is the asterik for?
Page 25, Action 2	same as above.
Page 25, Action 2, sub-action 2b, timeframe & key milestones	change to specific year
Page 25 - Action 4	similar to the above, STAC is listed as a lead for this item along with CIB. Please share expectations/needs that you are aware of at this point.
Page 25, Action 4, timeframe and key milestones	change to specific years
Page 26, Objective 1, paragraph 1, "For example, the tidal flushing (amount of water that the tides carry from the ocean to the Bay) in Indian River Inlet has increased since previous measurements were taken in 1988."	data to support that? provide reference
Page 25-26, Action 1, timeframe and key milestones	Specify years. Does plan components mean both models will be operational by 2024?
Page 27, Action 2, timeframe and key milestones	Specify years
Page 27, Action 3, timeframe and key milestones	If the models won't be operational for 3-5 years, I believe having an updated report within the same 5 years is not feasible.
Page 27, Action 4	isn't DNREC also involved in this?
Page 27, Action 4	It is not clear as to why Action 4 of Object 1, of Healthy Bay Ecosystems is not in Objective 2 or some other objective other than this modeling-based objective?

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Page 27, Action 4:	Is anyone actually reestablishing bay grasses? All of the efforts below suggest monitoring what is or isn't out there. But, there is no discussion of what efforts the CIB may/may not engage in to replant or reestablish bay grasses.
Page 27, Action 4, timeframe and key milestones	Only eelgrass? [referencing updating the water quality index]
Page 27-28, Objective 2, "Protecting wetlands and shore-zone habitat will help to protect juveniles. . ."	Adult spawning habitat and juvenile nursery grounds
Page 27-28, Objective 2, "...long-term reductions in nutrient pollution fueled algae blooms in the Bays will lead to improved oxygen levels that will benefit young fish, especially in tributaries."	Survival and growth are both potentially enhanced. The effect has two parts.
Page 28, Action 1, Performance Measure:	Can/Should you list what specific number of projects have been completed? Unsure if this is just normal sop.
Page 28, Action 2, Performance Measure	Can/Should you list what specific number of projects have been completed? Unsure if this is just normal sop.
Page 28, Action 3, timeframe/performance measure	Are these comments submitted by all partners or are specific to center staff? How will you track that?
Page 28, Action 3, Performance Measure	Can/Should you list what specific number of projects have been completed? Unsure if this is just normal sop.
Page 29, last paragraph, "Beaches are another important shoreline type to the Inland Bays watershed. A number of characteristic species, including horseshoe crabs, depend upon the beaches of the Inland Bays for spawning and feeding habitat. So, too, do migrating birds."	I know the McGowan et al. paper recently discussed horseshoe crabs in the Inland Bays. But, has anything come out in the primary literature on migrating shorebirds?  I think these two sentences stick out and should either be more fully developed to make the connection between the inland bays and these species or deleted.
Page 29, Action 3, timeframe/performance measure	By CIB or all partners? How will you capture this metric and track progress?
Page 30, Objective 4	It would seem to me, that this should suggest the CIB will increase advocacy for an increase in regulatory protections. Being a non-profit, the CIB has little to no authority to actually generate regulatory protections without advocating for them.
Page 30, Action 1	This action needs to be most carefully worded. Having been on numerous CCMP development teams in different NEPs, the use of the term "advocate" shoots up yellow flags. When written in association with regulatory or other governmental change the flag starts turning red. The concern is with the public interpretation as much as actual actions. Advocacy is easily lumped into lobbying, which can be a major no-no for

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	federally funded and overseen programs. There is guidance in this area for the NEP. Relative to what is actually proposed under this action, I have no issue. It is just good potential risk reduction practice to avoid certain words. The funding statement under this action appears to recognize this concern at some level. However, if this is done, there needs to be a documentation procedure in place to demonstrate how funds and staff are being used. Is there any way we can substitute a different word in place of “advocate” to further separate this action from potential misinterpretation?
Page 30, Action 1, performance measure	Same comment as above - is this specific to Center staff or all partners?
Page 31, Action 1, performance measure	Suggest that the measure of performance not only track the number of acres of oyster reef establishment, but also the different types of reef and their level of success.
Page 31, Action 1, Performance Measure	Again, should these actions, 1, 2 and 5 have specific target metrics in the number or is that inappropriate?
Page 31, Action 2, Performance Measure	Again, should these actions, 1, 2 and 5 have specific target metrics in the number or is that inappropriate?
Page 31, Action 3	This is a Delaware Sea Grant mission too, that we target with publicly open Shellfish Forums and meetings of the Delaware Aquaculture Association. Should that be included here?
Page 32, Action 4, cost and potential funding	Be consistent here. Other parts in the document you do not EPA in front of Sec 320. Other spots you have it as CWA Sec 320.
Page 32, Action 5, Performance Measure	Again, should these actions, 1, 2 and 5 have specific target metrics in the number or is that inappropriate?
Page 35, Objective 2	Recommend removing 'application of' - Objective 2 suggested language "Increase sustainable growth practices to reduce environmental impact"
Page 35, Action 3, timeframe and key milestones	The performance measure does not align with the action. The action does not say that a stakeholder group will be formed.
Page 36, Action 4	Recommend changing increased to improved
Page 36, Sub action 4a, timeframe and key milestones	is this timeframe still accurate? If not, update. [timeframe is end of 2019]
Page 37, Action 2, sub-action 2a, timeframe and key milestones	Do you have goals of students reached annually?
Page 37, Action 2, sub-action 2b, timeframe and key milestones	same comment as above
Page 38, first full paragraph, “Through the development of an Education and Outreach Action Plan, the Inland Bays Estuary Program intends to form a group to assist other organizations in meeting educational and outreach goals set in this CCMP”	In previous sections, you describe the NEP as CIB and Partners - this might confuse readers. Be clear on the NEP program and CIB and partner’s roles are.
Page 38, Action 1, timeframe and key milestones	You don't use Fiscal Year anywhere else in document. Update to reflect consistency.