

5.0 WHO CURRENTLY MANAGES AND PROTECTS THE NIAN TIC RIVER WATERSHED?

This section introduces the discussion of who will be responsible for implementing the recommendations in this plan. It is paramount to the planning effort to understand the existing political framework and its components so that if we can be understood where this watershed plan and how its recommendations fit into the community. Therefore, a review of the current “institutional environment” was completed in order to better understand the levels of government and other stakeholders who would be responsible for decision-making associated with the implementation of this plan.

The fact that the Niantic River Watershed is a *natural* system and not a *political* division creates several challenges for managing it. Federal, state, and local jurisdictions are charged with managing the natural resources of the watershed, including the activities of people desiring to use them. Resource management issues such as nonpoint source pollution are addressed through a variety of disparate policies and programs that are infrequently coordinated to meet common objectives. Hence, this planning effort has emphasized the coordination of governmental and nongovernmental stakeholders in managing nonpoint source pollution in the Niantic River Watershed.

Beginning at the federal level, agencies such as USEPA, NOAA and the ACOE are driven by their mandates under the Clean Water Act to manage nonpoint source pollution in the Niantic River Watershed. They administer their statutory mandates in partnership with CTDEP and its various subdivisions. The CTDEP BWPLR contains the majority of water quality programs concerned with nonpoint source pollution, which are primarily, but not limited to, Section 319 Nonpoint Source Pollution Management Program, Office of Long Island Sound Programs, Inland Wetlands, Water Quality Program, Watershed Management Program, and Total Maximum Daily Load Program. Other bureaus of CTDEP dealing with the management of fish and wildlife and waste management, have important, yet not as central roles in managing the watershed.

As mentioned earlier, CTDEP is one of the major driving forces behind this planning effort. In addition to administering CZARA Section 6217¹⁴ funding through OLISP, CTDEP must assume responsibility for managing the Niantic River because of its current impairments (303(d) List), which will inevitably lead to the development of a TMDL for bacteria and nutrients for the river. CTDEP NPS Management Program delivers other financial support for managing nonpoint source pollution.

Other federal and state agencies involved in the management of the Niantic River Watershed include those agencies that provide funding or technical assistance for management of the watershed. On the federal level, USGS and USDA NRCS play important roles in delivering scientific information and technical know-how in support of watershed management. Similarly, USFWS and NOAA Fisheries have responsibility over fish and wildlife and provide data regarding these resources as well as, play a regulatory role when issues of imperiled species are present.

The greater proportion of land use decisions lie at the local level with the four municipalities of the watershed. The rubric of planning and zoning regulations in these communities constitute the body of policy guiding land use and stormwater management in the watershed. The range of policies includes areas that are essential to the management of the watershed and nonpoint source pollution. These include planning and zoning policies dealing with inland wetlands, storm sewer system management, road construction, on-site wastewater disposal, open space protection, groundwater/wellhead protection, and soil loss/erosion control. Table 5.0-1 summarizes the planning and regulatory framework for water resource protection in the four towns within the Niantic River Watershed. Each of the towns are making great efforts to do their part in protecting the waters of their communities. A more effective approach may be to match protection items for a consistent watershed wide approach to protecting water quality. For example, the towns of East Lyme and Waterford each have a 100-foot upland review for wetlands and watercourses, where the towns of Montville and Salem have different buffer areas; if all towns in the watershed had a 100-foot upland review area, the collaboration may provide optimal protection to these important wetted areas.

¹⁴ Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990

Nongovernmental organizations are active in the management of the Niantic River Watershed. Save the River/Save the Hills¹⁵ is a non-profit 501(c)(3) grassroots environmental organization based on the Niantic River Estuary in Waterford and East Lyme, Connecticut. The mission of the organization is, *to abate and prevent pollution of the river by, operating a pumpout boat; advocating the preservation of the Oswegatchie Hills; advocating sewers for East Lyme waterfront neighborhoods; encouraging the towns of Waterford and East Lyme to fulfill their obligations under the Federal Phase II Storm Water Regulations and preserve the natural beauty of the Oswegatchie Hills* (Save the River, Save the Hills, 2006). Friends of the Oswegatchie Hills Preserve¹⁶ is another watershed-based group involved in conservation activities in the watershed. The organization's website describes their mission: *To raise public awareness and gain the funds necessary to purchase the remaining undeveloped land within Oswegatchie Hills and create a Nature Preserve for future generations to enjoy.*

¹⁵ www.savethe.river-savethehills.org

¹⁶ www.oswhills.org

Table 5.0-1. Municipal Regulatory Framework For Water Resource Protection (Fall 2005)

Watershed Protection Item	East Lyme	Montville	Salem	Waterford
<i>Wetland/watercourse regulations</i>	100 ft upland review area for wetlands and watercourses.	50 ft upland review area for wetlands and watercourses.	75 ft upland review area for wetlands and watercourses.	100 ft upland review area for wetlands and watercourses.
<i>Floodplain protection</i>	Development in floodplains regulated via FEMA standards (require flood-proofing for commercial structures and raising floors of residential structures 1 foot above base flood elevation).	Follow state regulations.	Uses state standard model regulations, for subdivisions of at least 5 acres or 50 lots.	Development in floodplains regulated via FEMA standards (require flood-proofing for commercial structures and raising floors of residential structures 1 foot above base flood elevation).
<i>Zoning overlay districts/ Zones for resource protection</i>	AqP and AqS overlay zones; CAM; TM; Greenway Conservation District.	One aquifer protection zone, already built out.	Have a Seasonal Residential Zone and Commercial Recreation Zone, which help preserve area at Gardner Lake.	Has Open Space District where specified uses by permit are less intensive (does not include Niantic River area).
<i>Aquifer protection</i>	AqP and AqS overlay zones. Town will be looking at adopting state model regulations but must wait for Level A mapping.	One aquifer protection zone, already built out.	For Planned Recreation/Residential Community, applicants must show aquifer protection considerations in environmental mgt report.	No special districts or provisions in place.
<i>Stormwater Management</i>	Informally apply state stormwater design manual but nothing is codified. POCD recommends a variety of more protective BMPs.	Use CT stormwater design manual; regulations now being updated to specify its use.	Various regulations in place. Stormwater control established for roads and parking areas (with bituminous & curbs favored). PRDs have 13% max impervious surface limit.	No specific requirements but require stormwater to be contained on site. The Special Development District addresses imperviousness.
<i>Erosion & Sedimentation Control</i>	Development requires E&S Control Plan per State Guidelines for disturbances of 1/2 acre or more and within 50 ft of "sensitive resources".	Recommends use of CT E&S Control Guidelines.	Applies E&S regulations based on CT E&S Control Guidelines for disturbances of 1/2 acre or more.	Use standards similar to state guidelines. E&S control plans approved at time of site plan approval - includes construction phasing & maintenance.

Watershed Protection Item	East Lyme	Montville	Salem	Waterford
<i>Alternative subdivisions</i>	Use minimum area buildable land criteria for subdivisions (20,000 SF min. for lots at least 40,000 SF). No wetlands on buildable land and no slopes greater than 20%. POCD recommends consideration of adopting soils-based net buildable area zoning. Cluster/open space subdivisions allowed in RU-40 & up.	Minimum lot size is 40,000 SF in RM-40 and 20,000 SF in RM-20.	Yes: for purpose of increasing residential choices and/or preserve open space and natural resources. Also: Net Buildable Area criteria apply for lots after Dec. 1 2003.	Cluster subdivisions are allowed in all residential zones. Town uses minimum buildable area. Steep slopes >25% are non-buildable except for access.
<i>Watershed planning approach</i>	No holistic planning other than for public water supplies.	Town shares development plans with Norwich CTDPUcs of two watersheds - Lake Konomoc and Stony Brook Reservoir.	No formal regulations or planning on watershed basis, but Salem has signed the Eightmile River Watershed Compact.	Uses a watershed approach for the Jordan Cove Watershed.
<i>Coastal Site Plan Review</i>	Yes.	Yes.	No.	Yes.
<i>Sewered Area</i>	Yes -- most of town south of I-95; beach areas done and some areas north of I-95 along Rt 161.	Not in Niantic Watershed.	No.	Yes – most of the neighborhoods along the Niantic River shoreline except for homes along Konomoc Avenue and north of I-395.

Watershed Protection Item	East Lyme	Montville	Salem	Waterford
<i>Other</i>	Pesticide report required for sites ever used as farmlands/commercial. ERT report required for subdivisions of 20 lots or more in sensitive areas. Waterford-East Lyme Shellfish Commission has brochure - how homeowners can help protect WQ of Niantic River. Formation of the Niantic River Gateway Conservation Zone to establish conservation along the river.	No control of herbicides/pesticides.	N/A	Waterford-East Lyme Shellfish Commission has published a watershed-focused brochure describing ways homeowners can help protect the water quality of the Niantic River. Formation of the Niantic River Gateway Conservation Zone to establish conservation along the river.
<i>List of Commissions or Officials with Authorities over Water Resources</i>	Planning Commission; Zoning Commission; Conservation Commission; Health Department; Building Department; Water & Sewer Commission; East Lyme Harbor Management/Shellfish Commission; Niantic River Gateway Commission; Regional Planning Commission; Route 11 Greenway Authority Commission .	Planning & Zoning Commission; Wetland Commission; Water Pollution Control Authority; Regional Planning Commission; Route 11 Greenway Authority Commission.	Planning & Zoning; Inland Wetlands and Conservation; Building Official; Sanitarian; Regional Planning Commission; Route 11 Greenway Authority Commission.	Planning & Zoning; Conservation Commission; Sanitarian; Waterford Shellfish Commission; Niantic River Gateway Commission; Regional Planning Commission; Route 11 Greenway Authority Commission.

Note: Refer to Appendix A for Acronyms.

5.1 Town Summaries of Planning and Regulatory Authorities

A review of the institutional environment in which watershed management occurs on the local level was conducted for this study. Discussions with planning officials and reviews of local policy were executed in order to compile this information. These town-by-town summaries detail the planning and regulatory authorities that affect water quality. The results of this review will allow for recommendations to be made to the existing watershed management framework. Much of this information comes from the zoning regulations adopted for each town.

East Lyme (Website: www.eltownhall.com)

The Town of East Lyme has several commissions with authorities over the management of water resources. The names of these commissions and a brief description of their authority is provided here:

- Planning Commission - oversees subdivision regulations and re-subdivision and the compilation of The Plan of Conservation and Development.
- Conservation Commission – review applications and grants permits for activities with inland wetland/watercourse jurisdiction.
- Health Department (Ledge Light Health District) – approval of septic system applications.
- Zoning Commission – Site Plan, Special Permit Review and Zone Changes.
- Water and Sewer Commission – oversees water and sewer infrastructure.
- Regional Planning Commission – a sub-unit of the Southeastern Connecticut Council of Governments (SCCOG) and is composed of one representative from the planning commission of each member municipality.
- Niantic River Gateway Commission – a special joint commission formed by ordinances in East Lyme and Waterford to set standards for development with the Conservation Zone along the Niantic River.

- East Lyme Harbor Management/Shellfish Commission – dedicated to improving public safety on the waterways and opening new recreational shellfishing grounds (in Niantic Bay).

The following is a list of local policies and programs, administered by the Town of East Lyme, summarizing local mechanisms as they relate to watershed management. Some of this information is captured in Table 5.0-1.

- *Wetlands Regulations*: 100-foot upland review area for wetlands and watercourses.
- *Floodplains*: The town regulates development in floodplains (Section 20) based on the FEMA standards (require flood-proofing for commercial structures and raising floors of residential structures 1 foot above base flood elevation).
- *Overlay Districts/Zones for Resource Protection*
 - *AqP Overlay Zone* (aquifer & primary recharge)
 - *AqS Overlay Zone* (secondary recharge zone)
 - *Coastal Boundary Overlay District (CAM)*
 - Tidal Marsh District (*TM*)
- *Aquifer Protection*: The town has AqP and AqS overlay zones. The Zoning Commission is the current regulatory commission for aquifer protection and will be looking at state model regulations but must wait for Level A mapping, which is anticipated to be complete no later than June 1, 2008.
- *Stormwater Management (includes detention and retention, road design, impervious surfaces limits, curbs and swales, parking, and maintenance)*: East Lyme's Engineering Department is informally using the State *Stormwater Quality Manual* to guide new development but nothing is codified in town ordinances. The Plan of Conservation and Development (POCD) recommends incorporating more protective best management practices (BMPs) for Stormwater Management (pre-treatment requirements in aquifer protection areas or for commercial and industrial development; covers for storage piles; storage tank requirements; appropriate sewered areas and non-sewered areas to inhibit over-development).

- *Erosion and Sediment (E&S) Control:* For subdivision proposals in East Lyme, any disturbance of ½ acre or more requires an E&S control plan as well as if the disturbance occurs within 50 feet of the following sensitive resources: tidal wetlands, watercourses, beaches, dunes, naturally-eroding coastal bluffs. E&C Plans must be developed in accordance with the Connecticut Guidelines for Soil Erosion and Sediment Control.
- *Slopes:* There is some consideration for slopes in East Lyme’s subdivision ordinances, which apply to the minimum buildable area criteria, *i.e.* no more than 20% of the lot can have topography exceeding 25% slope (applies to lots of 20,000 SF or more). No protection exists relative to commercial developments.
- *Provisions for Alternative Subdivisions:* Plan of Conservation and Development recommends consideration of adopting soils-based net buildable area zoning.
- *Coastal Site Plan Review:* Required, if any part of subdivision is within the coastal boundary.
- *Other*
 - Pesticide Report – required for sites once classified as farmlands per CGS 12-107c or other commercial use with regular applications of pesticides. Applicant must provide history of pesticide use and evaluation of potential human health impacts.
 - Environmental Review Team (ERT) report – required for subdivisions of 20 lots or more if 50% of subdivision area is considered environmentally sensitive (wetlands, slopes over 25%, flood hazard areas, ridges, watercourses).

Montville (www.townofmontville.org)

The Town of Montville has several positions and commissions with authorities over the management of water resources. The names of these positions and commissions and a brief description of their authority are provided here:

- Planning and Zoning Commission – Site Plan and Special Permit Review.

- Wetland Commission - review applications and grants permits for activities with inland wetlands/watercourses.
- –Union Health District – septic approvals.
- Water Pollution Control Authority – oversees public sewer system management and planning.

The following is a list of local policies and programs, administered by the Town of Montville, summarizing local mechanisms as they relate to watershed management. Some of this information is captured in Table 5.0-1.

- *Wetlands Regulations:* 50-foot upland review area from wetlands and watercourses.
- *Flood Plains:* Development in floodplains is regulated similar to state regulations.
- *Overlay Districts for Resource Protection:* One aquifer protection zone exists (see next item).
- *Aquifer Protection:* There are no real restrictions in the one aquifer protection zone; the zone is already developed.
- *Stormwater Management (includes detention and retention, road design, impervious surfaces limits, curbs and swales, parking, and maintenance):* The town engineer reviews stormwater per the *Stormwater Quality Manual*. Currently, the stormwater measures are not codified but regulations are being upgraded to specify the use of the *Manual*.
- *Erosion and Sediment Control:* Ordinances recommend use of CT E&S control guidelines for development (but guidelines are not codified in the regulations).
- *Watershed Approach (Regulations by Major Watersheds):* Town shares development plans with Norwich DPUC of Lake Konomoc and Shiny Brook Reservoir Watersheds.
- *Provisions for Alternative (Cluster, Open Space) Subdivisions:* Montville has cluster subdivision alternative, but it is due to be updated.
- *Coastal Site Plan Renew:* Required if any part of subdivision is with the coastal boundary.

Salem (www.salemct.gov)

The Town of Salem has several positions and commissions with authorities over the management of water resources. The names of these positions and commissions and a brief description of their authority are provided here:

- Planning & Zoning Commission – Subdivision, Site Plan and Special Permit Review.
- Inland Wetlands & Conservation Commission – review applications and grant permits for activities with inland wetlands/watercourses.
- Sanitarian – septic approvals.

The following is a list of local policies and programs, administered by the Town of Salem, summarizing local mechanisms as they relate to watershed management. Some of this information is captured in Table 5.0-1.

- *Wetlands Regulations:* The Town has adopted the standard State’s model wetland regulations with a 75-foot upland review area for watercourses and wetlands. The Town has also established regulations setting a minimum amount of land required should wetlands be on a site or if accessory apartments are present, as well as for Planned Residential Developments. Also, developers are required to provide alternatives for the site development and reasoning for their choice.
- *Flood Plains:* The Town has the standard State model regulations. The regulations are particular to subdivisions of five (5) acres or 50 lots.
- *Overlay Districts for Resource Protection:* The Town has a Seasonal Residential Zone and a Commercial Recreation Zone, which help to preserve the area around Gardner Lake.
- *Aquifers:* Applicants must show they are taking aquifers into account in the environmental management report that is necessary for a Planned Recreation/Residential Community.
- *Stormwater Management (includes detention and retention, road design, impervious surfaces limits, curbs and swales, parking, and maintenance):* A

broad range of stormwater regulations are in place. The town uses the 25-year storm as the design criteria. A 13% maximum limit is set for impervious area in PRDs. Treatment measures such as swales, detention basins and ponds are cited as potential measures to control stormwater runoff. Regulations are in place for control of stormwater for protection of groundwater. Control of stormwater is established for roads and parking areas; the Town favors traditional design criteria requiring use of bituminous materials and curbing.

- *Erosion and Sediment Control:* The Town uses the standard regulations based on the Erosion and Sediment Control Guidelines set forth by the State. The standards are applied to land disturbances of ½-acre or more.
- *Net Buildable/Soil Based Zoning:* Regulations have been established using net buildable area as a means for regulating development. Net Buildable Area is required for each new lot created after December 1, 2003.
- *Slopes:* Regulations are in place setting design criteria as well as recognizing the potential impact from development on steep sloped areas.
- *Watershed Approach (Regulations by Major Watersheds):* Salem has signed the Eightmile River Watershed Compact, indicating recognition of the municipality as part of a larger watershed community. In February 2006, the Town voted to endorse the proposed Eightmile River Management Plan, which includes a range of planning and zoning mechanisms to protect riparian corridors, control stormwater, control impervious surfaces, and reduce habitat fragmentation.
- *Provisions for Alternative (Cluster, Open Space) Subdivisions:* Regulations allow developer to propose alternative type development to increase residential choices and/or preserve open space and natural resources.

Waterford (www.waterfordct.org)

The Town of Waterford has several positions and commissions with authorities over the management of water resources. The names of these positions and commissions and a brief description of their authority are provided here:

- Planning and Zoning Commission issues – review and approval of subdivisions, site plans, Special Permits and Coastal Site Plans.

- Conservation Commission – oversees/regulates inland wetlands and watercourses permits.
- Sanitarian – serves as the agent for the Director of Health and responsible for issuing permits for the installation of wells and septic systems. Also responds to shellfish management issues.

The following is a list of local policies and programs, administered by the Town of Waterford, summarizing local mechanisms as they relate to watershed management. Some of this information is captured in Table 5.0-1.

- *Wetlands Regulations:* The town has an 100-foot upland review areas for both wetlands and watercourses.
- *Floodplains:* The town regulates development in floodplains based on the FEMA standards (require flood-proofing for commercial structures and raising floors of residential structures 1-foot above base flood elevation).
- *Overlay Districts for Resource Protection:* The town has no overlay zones to protect specific resources but they have an Open Space District, where the specified uses (permitted) are less intensive. This district does not include the Niantic River area.
- *Stormwater Management (includes detention and retention, road design, impervious surfaces limits, curbs and swales, parking, and maintenance):* Waterford has no specific requirements in their regulations but they review each application and require stormwater to be contained on site. One zone, the Special Development District (SDD) does address imperviousness. The Town of Waterford operates much of its storm sewer system under a General Permit for the discharge of stormwater to a municipal separate storm sewer system (MS4), which required the Town to complete a Stormwater Management Program Plan (SWPP). The SWPP contains implementation actions to meet the six minimum measures of the MS4 Permit.
- *Erosion and Sediment Control:* Town regulations spell out the E&S control requirements. Although they do not reference the State guidelines, they are

similar. The E&S control plans are approved at the time of site plan approval and include such considerations as construction sequence and maintenance.

- *Slopes*: Steep slopes are regulated as non-buildable areas if they are over 25%. No development is allowed on steep slopes unless it is required for access.
- *Watershed Approach (Regulations by Major Watersheds)*: The town uses the Jordan Brook Watershed Plan as guidance for developers and for development approvals on areas within that watershed, which encompasses approximately 70% of Waterford. The plan included studies of wetlands, potential build-out as a basis for recommendations.
- *Provisions for Alternative (Cluster, Open Space) Subdivisions*: The town allows Cluster Subdivisions in any residential district. The cluster allows higher development densities in exchange for preserving more sensitive portions of a development site as open space. The town uses the Minimum Buildable Area method of calculating developable area.
- *Coastal Site Plan Review*: Required if any part of subdivision is within the coastal boundary.

Joint Municipal Commissions

The Towns of East Lyme and Waterford mutually participate in two commissions dealing with the management of natural resources, including the Niantic River and its watershed. The name and function of these commissions are provided:

- *Niantic River Gateway Commission*¹⁷ – Chapter 478a, Sections 25-109a through 25-109p Connecticut General Statutes enables the Towns of East Lyme and Waterford to form by ordinance this joint commission. The commission was empowered to give consideration and to administer standards, “to the conservation and preservation of sensitive coastal resources, scenic vistas, and unique habitat(s)” in a zone associated with the Oswegatchie Hills area.

¹⁷ www.cga.ct.gov/2005/pub/chap428a.htm

- *Waterford/East Lyme Shellfish Commission* – This joint commission was formed by the Towns of East Lyme and Waterford to manage the shellfish beds of the Niantic River, exclusively. All harvesting, transplanting and aquaculture operations are approved through this commission.

Regional Government

East Lyme, Montville, Salem, and Waterford participate in the SCCOG. SCCOG is the second largest of Connecticut's fifteen regional planning organizations. Member town representatives make up the actual Council. It also has as non-voting affiliate members; two federally recognized Native American Tribes. SCCOG also has liaison representation from the United States Naval Submarine Base and the United States Coast Guard Academy. Operating under the provisions of Sections 4-124i through 4-124p of the Connecticut General Statutes, the SCCOG is assigned several duties: making a plan of conservation and development for the region; assisting municipalities within the region, as well as state and other public and private agencies; and performing a variety of advisory review functions. Under federal transportation law, SCCOG functions as the region's Metropolitan Planning Organization (MPO), responsible for coordinating transportation planning in southeastern Connecticut¹⁸.

5.2 **Organizational Approaches for Watershed Management**

Recommendations for altering the structure of municipal and state government to more effectively manage watersheds and water quality tend to be disregarded because of their inherent political challenges. The Niantic River Gateway Commission, however, is a unique entity in that its formation demonstrated that inter-municipal planning with the goal of managing natural resources is possible. Fulfilling the intent of the law that created the Gateway Commission would be a considerable step forward in helping protect the Niantic River and may set the stage for amending the law to broaden the scope and powers of the Commission.

¹⁸ <http://www.seccog.org/about.html>

The recommendations in this plan rely heavily on local adoption and implementation for this plan to have its intended impact. Each of the four communities would have to make planning and zoning changes, enable stricter enforcement of riparian setbacks and implement stormwater management programs. With few incentives for communities to work together to adopt and implement watershed management measures, it is necessary to take advantage of those that exist. In this regard, endorsement of this watershed protection plan by 1) the Project Steering Committee and 2) all four of the towns is an important *political* step.

Although the greater proportion of this plan's implementation relies on the independent action of the four watershed communities, CTDEP support and stakeholder compliance, a watershed forum could enhance certain watershed management activities. Establishment of a watershed coalition, for instance, could be built around the mission to complete specific management activities. In contrast, it is not recommended to form a coalition created to serve primarily as an open forum to discuss watershed issues. Watershed partnerships that are formed without a clear work agenda fail. Of the wide range of actions recommended by this watershed management plan, several of them – namely information/education campaigns, stormwater management measures, water quality monitoring - can truly benefit from group cooperation and collaboration. To implement these activities, the four towns could collaborate to acquire funding; share technical resources, equipment, and materials; conduct public and media relations; and sponsor festivals and events. A multi-jurisdictional, public/private coalition or partnership would foster such collaboration.

Recommendation: *East Lyme and Waterford should fulfill the intentions of the enabling statute of the Niantic River Gateway Commission to protect those areas identified by statute.*

Recommendation: *The four watershed communities and their respective state legislators should meet to discuss the feasibility of expanding the scope and powers of the Niantic River Gateway Commission to include Salem and Montville and to empower them to develop administrative standards to protect critical resource areas throughout the entire*

watershed. This coalition would be strengthened significantly by building a foundation supported by scientists, planners and managers and interacting directly with communities.

Recommendation: *Similar to the approach taken by the Eightmile River Wild & Scenic Study Committee, the Niantic River Watershed Protection Project Steering Committee should formally vote to endorse the final Niantic River Watershed Protection Plan. The Committee should then consider how to present it to the Boards of Selectmen in each town for the community's endorsement.*

Recommendation: *The Project Steering Committee should consider the formation of a watershed partnership or coalition. This body could be an ad hoc entity to regularly meet and collaborate on the implementation of specific aspects of the watershed plan. Or, the entity could be formed as a subcommittee of the Southeastern Connecticut Council of Governments, which may also assist in coordinating the body and implementing the plan.*