



Digest of Public Comments **Re-arranged by topic**

The Us Forest Service received 119 messages regarding the Resource Assessment for the Highlands of Pennsylvania and Connecticut (Part 1 of the Highlands Regional Study Updates for Pennsylvania and Connecticut) during the public comment period that began on 23 June and ended on 15 August, 2006. Messages came by mail, telephone, e-mail, and through the agency's automated reply form at the Highlands web site.

Some messages covered more than one subject, many messages commented on the same subject. The following Digest of Public Comments arranges comments by topic under bold-faced headings. Comments are numbered sequentially from 1 to 68 for the purposes of this digest. Numbers in parentheses following each comment refer to the Log of Public Comments where they were entered in the order received.

Responses from the study teams are in Italics.

Comments that raise issues unrelated to the Resource Assessment's protocol

1 The interactive maps have made it very clear where important ecosystem resources are located within the Highlands Region and have made it possible for the general public to get a sense of the importance of offering protective measures for conservation. (21)

We hope to make greater use of this method to provide map information to the public and stakeholder groups.

2 The important step at this point is to make this information widely available through "marketing" measures. There are many non-profit organizations affiliated with conservation measures which would be more than happy, I imagine, to link to the Forest Service website. (21)

This is an idea we will pursue.

3 I disagree with the infringement of private landowners' rights that the strict measures that Highland Conservation would enact. (06)

The U. S. Forest Service will apply results of the study to focus its efforts to conserve and improve forest resources in the region; this is done in cooperation with state agencies and private landowners through voluntary and non-regulatory programs.

The study will also fulfill the U. S. Forest Service's obligation under the Highlands Conservation Act of 2004, Public Law 108-421, to identify areas of high resource value in the region. The Act, among other things, authorizes Federal assistance to the States for the purchase of land or interest in land from willing sellers with the aim of protecting forest and other resources.



4 For me and my entire family, backpacking and other outdoor activities such as kayaking, biking, hiking and rock climbing are absolutely essential to our happiness and well being. Land for these activities must be conserved. (30)

5 Consult Significant Habitats and Habitat Complexes of the New York Bight Watershed at <http://www.fws.gov/r5snep/publications.htm> ; it includes chapters relating to the forest corridor in the New York and New Jersey portion of your study area. (16)

The cited information does not affect resource mapping in Connecticut or Pennsylvania; however, it will be a point of reference when the study team develops conservation strategies in collaboration with stakeholder groups.

6 I was pleased to see the emphasis on forest resources captured much of the highly productive areas of private and state forestland in highest categories. (17)

7 Without a stable and productive forest and agricultural land base throughout the region, there is little incentive for local communities to support the program. Emphasize the importance of goods and services from the land in sustaining rural communities and jobs. (17)

8 Protect as much of the Highlands as possible from development. (28)

9 Areas that are wild should be kept as such. (28)

10 Sustainable forestry, hunting, and low impact recreation should be encouraged. (28)

11 Commercial development should be carefully regulated. (28)

12 Recreational use of the highlands needs to be a core component of the plan. But not just hiking, you need to include motorized use as well. We're not all up to hiking mountaintops, but we can enjoy them if allowed 4WD access. Proper management of 4WD trails allows sustainable use, but you must plan for it. (50)

13 Add watersheds to list of layers on the interactive map server. (29)

We will add a watershed layer to the interactive map server, based on the water resource analysis which will be done by the US Geological Survey in Part 2 of the study.

How does the Conservation Values Assessment come out of the Resource Assessments?

14 It's not clear to me exactly what the Conservation Value index is. What are the scale, criteria, and source of input? (14, 22)

The Conservation Values Assessment is a summation of five resource assessments. Water resources, biological resources, forest resources, agricultural resources, and recreational/cultural resources were assessed as separate categories prior to making the composite Conservation Values Assessment. All resource data were made to conform to a 30 meter grid (each grid square, or cell, covers about ¼ acre). Resources were evaluated and

given weights, or ranks. The Conservation Values Assessment added the assigned weights of all data layers in every grid cell. The result is a map of lighter-to-darker cells, corresponding to their scores. To improve legibility and interpretation, scores were grouped on a scale divided into five ranks from lowest-to-highest conservation value. The ranks were adjusted to include within each rank as close to 20% of the map's area in Pennsylvania and Connecticut as the scores allowed.

Distribution of high and highest conservation values should be re-adjusted

15 Noncontiguous, scattered higher value cells detract from areas with more concentrated resources. (27)

16 Expand small areas of high conservation value so that they are not just isolated islands, but can provide adequate protection for natural resources and make sense from a land protection standpoint. (52, 104, 109, 113, 118)

The Highlands resource assessment is intended to discover how the region's natural resources are distributed. The Conservation Values Assessment map shows pattern, not randomness. Discontinuities in the pattern result from natural variations or human activities. The resulting pattern raises a great many questions, among which are: Do the high conservation value areas correspond with places citizens deem important? Are they too small or too large? Should all concentrations of high resource value be connected to one another, and if so, how can it be accomplished? Is an area with relatively low resource value unimportant or incapable of providing value? These issues will be explored during Part 2 of the Highlands study.

17 There may be an uneven distribution of cells among the quantiles that results in an undercount of high ranked cells. If so, this should be corrected. (27)

It is not possible for high value cells to be undercounted when quantiles are used, as they were with this study process.

Areas that rank high in one resource category should rank high in the composite Conservation Values Assessment

18 If an area ranks high in any one criterion it should be high in the composite, or at least for project evaluation purposes.

If resources in a category such as agricultural, forests, recreational/cultural, water resources, or biodiversity rank as having high conservation value, they should be designated as a high conservation value area on the composite map. (27, 52, 104, 113, 118)

The issue here is basically about the pros and cons of doing a "maximum" calculation in the GIS compilation process, rather than a "sum" (or average). The sum shows you where cumulative conservation values are the highest. With the maximum compilation approach, you are showing simply where one resource out-weighs another.

While the “maximum” approach may be helpful in some areas for specific reasons, what the resource assessment is intended to identify is where cumulative values of the 5 resource groups are highest, not where the highest value of just one resource group is found.

19 All riparian buffer areas should be included in the highest conservation value lands. (52)

The study team was tasked to analyze existing, rather than potential, conservation values. Probably a large proportion of riparian buffer areas are in existing land covers that would not currently warrant protection, and may never warrant protection, whether they were restored or not.

The team used a data set previously developed by natural lands Trust which ranked riparian buffer areas according to the value of their existing land cover. Buffer areas went through an additional evaluation in which they were given added weight, determined by stream order. Low order, 1st and 2nd order streams, are headwater stream. Headwater streams are considered more important to water quality than larger, higher order streams.

20 Areas of relatively unbroken forest canopy and large blocks of forested cover should score high on biological, water and recreation resources. (17)

Large blocks of forest were weighted favorably for biological and water resource values. This was not done for the recreational/cultural resources assessment because very few recreation activities are affected by forest block size.

Land that is already protected should not be ranked

21 Existing protected land should not be ranked. (27, 83, 112, 113, 118)

22 Already protected lands should not be included because it leaves areas threatened by development with a lower ranking. (52, 83, 104, 118)

Parklands, game lands, and other lands open to public use are among the most valuable recreational resources in the Highlands. Study teams in Connecticut, Pennsylvania, New York, and New Jersey have consistently ranked them highly to reflect their recreational value and the considerable public investment they represent. When such lands encompass areas of high value for water, forests and biological resources, the conservation values assessment, which sums values across five resource categories, will reflect that combination. As a result, parklands are often found to rank in the top 40% for conservation value.

It is fair to ask whether parklands are over-rated in the Highlands resource assessment. It is not relevant to ask whether they are already protected, because the Highlands study is intended to determine: First, where are the region’s most important resources, second, what are the threats to their future? Later parts of the study will determine what is and is not protected (Gap Analysis) and what can be done to conserve those areas and resources that have no protection (Strategies).

The Gap Analysis stage of the study will add the outlines of protected lands to show where high and highest conservation values coincide with parks and similar areas. In no state does the



amount of public land approach 40% of the Highlands, nor is it likely the states and counties have managed to buy nothing but the highest value resources in the process of acquiring their parks. There remains a considerable amount of high conservation value in need of measures other than state ownership for its protection.

Moreover, a radical change in the way conservation value is defined in Connecticut and Pennsylvania (masking all publicly-owned land) would require a re-study of New York and New Jersey.

23 The maps seem to put an overemphasis on areas that are already "protected" versus those areas with significant water, biological, cultural, or other resources that are vulnerable to further development. The fringes around these protected areas that might enhance connectivity between them would be a higher priority for conservation. (109)

The study team included protected areas and their associated buffers.

Large blocks of natural resources should be given greater weight

24 Every natural area over 750 acres in size should be ranked high. (27)

In Pennsylvania, there were no designated "Natural Areas" for which the team found GIS shape files. It is likely that most over 750 acres would be in or adjacent to existing park or game lands.

25 Areas of contiguous forest larger than 1,000 acres should be ranked as having high conservation value. (52, 83, 113, 118)

Large tracts of contiguous forest or interior forest were identified and ranked by size for the forest resource assessment. The biological resource assessment for Pennsylvania identified and ranked interior forest blocks and un-fragmented landscape blocks for their habitat value.

Patterns that seem to reflect political boundaries appeared on a natural resources assessment map, they may be assigning value where it does not demonstrably exist

26 The sharp transition from northern Montgomery and Bucks to Berks County (most clearly on the Forest Resources map) looks suspicious. (01)

This is a difference in the way the soils were mapped and is not something the team can address.

Other studies and plans should be incorporated in the Resource Assessment

27 Pennsylvania's county greenway plans should be incorporated into the overall conservation values map to help ensure collaborative protection of the resource areas at the federal, state, and local levels. (52, 104, 113, 118)

The study will address plans, greenway and otherwise, when gaps are identified and strategies are developed in collaboration with the states, counties, and other public and private organizations.

Results of the Resource Assessment should be tested against patterns derived from the Community Input process

28 Information collected from public forums and stakeholder interviews conducted by Penn State University should be overlaid on top of the GIS layers. This will help provide a public confirmation of the areas scientifically identified as having high conservation value. (113)

We can provide this image, and in fact have it available to include in the final report.

Recreation lands should be differentiated according to ownership and access

29 From the public's perspective, it would help to indicate public vs. private ownership as part of the Recreational/Cultural map. It affects the "usability" of the maps and the measure by which the success of the effort will be evaluated. (14)

This could be addressed relatively easily; however, it raises an issue about data sensitivity. Private lands may be protected by conservation easements or lands may be owned in fee by private entities; in either case, the owners may not want their properties identified to the public for fear the public will attempt to enter and use private land.

Explain what you mean by "visibility"

30 I would like to understand the method you used to determine a ranking of ridge-tops. What vantage points were used to determine whether they are "highly visible" or not? (109)

This raster dataset was created by combining Geologic outcrops from Pennsylvania scenic geology layer obtained from PA Department of Conservation and Natural Resources and a ridgetop analysis created using PA Small Watersheds dataset, slopes of greater than 20%, and Pennsylvania Land Cover dated 2000, developed by the Office for Remote Sensing of Earth Resources, Penn State University.

Geologic outcrops were converted to raster and assigned a conservation value of 10.

The ridgetop analysis was created as follows: PA Small Watersheds dataset was used to extract the watershed divides by converting the polygon to a polyline shapefile, buffering by 150 feet, and converted to raster. Slopes of greater than 20% were selected and converted to a raster. The watershed divides and steep slopes were combined to create a new layer where they converged. PA land use was classified into three categories: natural vegetation (forested), developed, and other. The land use data was added to the watershed divide-steep slope layer. Steep slopes combined with watershed divides in natural vegetation land cover were reclassified to a value of 10, steep slopes combined with watershed divides in other land cover were reclassified to a value of 5, steep slopes combined with watershed divides in developed land cover were reclassified to a value of 0.

The Geologic Outcrop Raster and Ridgetop Analysis Raster were combined as Maximum so that each raster cell was assigned the higher conservation value of the two rasters.



Conservation values were determined by experts gathered by the United States Forest Service Pennsylvania Highlands Study.

Specific places in Pennsylvania were missed by the assessment

31 Unami Hills area doesn't come out as high a priority. This area of diabase hills has a rich forest, relatively unbroken, and supports a high diversity of neo-tropical migratory birds. I personally know of areas, like the Unami Hills, that are of high conservation value but did not rank highly on the composite values map. For this reason, the composite map seems to fail the common sense test. (01, 27)

There are significant areas of high conservation value in the Unami Hills and along Unami Creek.

32 In your studies and work on this project please be sure to consider the Horse-shoe Trail which begins at Valley Forge National Park and goes out to the Appalachian Trail a distance of over 100 miles.
(25, 26, 33-49, 51-54, 56-75, 80-82, 84-95, 97-103, 105-107, 110, 115, 116, 119)

The Horse-shoe Trail is included with other recreational and cultural resources in the Pennsylvania Highlands resource assessment. Trails such as the Horse-shoe Trail were given the highest rank of 10.

Specific places in Connecticut were missed by the assessment

33 The preservation of the Riga plateau area in north western Connecticut should be a priority, as this is a beautiful, relatively unspoiled area for recreation. (04)

The Conservation Values Assessment identified large areas of high value on the Riga plateau.

34 Indian Mountain is an extension of the Riga Plateau, a large un-fragmented forest which drains into Mudge Pond. The Riga Plateau is an important recreational resource, with calcareous fens. The water quality of this drainage is rated as suitable for drinking. (108)

The Conservation Values Assessment identified large areas of high value on the Riga plateau.

35 There are substantial areas in the towns of Canton, Norfolk, Winchester and Colebrook that are of high conservation value and deserve protection. The towns contain high-quality habitat, large tracts of forest, grasslands, and marshes, rare species of plants, birds and mammals. (109, 112)

Water resources, forests, marshlands, and habitats for rare species of birds, animals and plants were included in the Connecticut Highlands resource assessment. Most data originate from State and Federal inventories and land cover stratifications. The team sought the best coverage for the Highlands that is uniform and currently available in a format compatible with the study's geographic information system. More local, fine-scaled information is very valuable to inform land use decisions at the municipal level; it cannot be easily incorporated into a study whose purpose is to evaluate resources in a uniform manner over a large region.

36 The Salmon Kill Valley has the highest priority for conservation for the Salisbury Association Land Trust. (108)

37 The Farmington River was designated a National Wild and Scenic River. The towns of Barkhamsted, Canton, Colebrook, Hartland, and New Hartford hold many large open forested and/or riparian areas that are not afforded land protection from the Wild and Scenic designation. (112)

The upper Farmington River was included with a weight of 5 in the canoe-able streams layer of the Recreation and Cultural Resources Assessment.

38 There have been natural resource inventories completed for the towns of Barkhamsted, Colebrook, and New Hartford which could be used to focus on areas that need protection. (29)

The team sought the best coverage for the Highlands that is uniform and currently available in a format compatible with the study's geographic information system. More local, fine-scaled information is very valuable to inform land use decisions at the municipal level; it cannot be easily incorporated into a study whose purpose is to evaluate resources in a uniform manner over a large region.

Important recreational and cultural resources in Pennsylvania were missed by the assessment

39 Recreational and cultural resources are understated in the map due to the problem of scale. Many of the recreational and cultural resources did not have adequate GIS data to properly represent them. (104, 113)

Historical and cultural sites for which there is no GIS shape-file were treated as point locations and assigned a buffer of 150 feet; this resulted in a footprint of about 2 acres for each site recorded as a locus. Parks, game lands, and historical sites for which there are mapped data in the form of polygons, were entered as such and then augmented with buffers of diminishing weight as they extend from the polygons in 1,000 foot increments (out to 3,000 feet). The result is more likely an over-statement of these resources than an under-statement, with regard to the area they actually occupy.

Important recreational and cultural resources in Connecticut were missed by the assessment

40 The Appalachian Trail Conference believes that the congressionally designated Appalachian National Scenic Trail merits the highest rank in any weighting scheme for recreational value, and that its view sheds and buffer corridors merit comparable treatment. (111)

The Appalachian Trail was included in the Recreational/Cultural Resources Assessment where it was given the highest weight of 5. Trails were assigned buffers of 300 feet to either side.

41 View sheds, land cover, and degree of remoteness are the three most important measures to determine acquisition priorities. The proximity of encroaching land uses is important, but the best single criterion of importance is determined according to view shed analysis. The Appalachian Trail Conference has performed this analysis and offers it to the Highlands study team. (111)

The study team will review the 2002 NY-NJ Highlands Technical Report to confirm the method used for view-shed analysis and see if it's possible to apply it in Connecticut. While the Appalachian Trail Conference can provide such an analysis for viewpoints along the trail, there are not defined viewpoints at many other places in the Connecticut Highlands.

Important water resources in Pennsylvania were missed by the assessment

42 Areas important for protection of water resources and quality are not fully captured in the analysis. (83, 104, 118)

The study team used the best available data to map and capture the water resources values in Pennsylvania. If the commentator has a specific criticism or suggestion regarding a data set they believe should have been included, the team would be happy to review it.

Important water resources in Connecticut were missed by the assessment

43 Water quality in Norfolk, Winchester and Colebrook is very high, generally Class A or AA, and worthy of preservation. (31)

The Connecticut Department of Environmental Protection will provide the appropriate rankings for all classed waters in Connecticut.

44 Include public water supply watershed areas, such as Barkhamsted and Nepaug Reservoirs. (29)

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

45 Towns like Barkhamsted are totally dependent upon wells and do not have a local water company to conduct aquifer recharge mapping; they are at a disadvantage under your ranking system. (29, 109)

Connecticut Department of Environmental Protection's Aquifer protection Areas will be incorporated into the Water Resources Assessment.

46 Class 1 and Class 2 Metropolitan District Commission-owned water supply lands should have the highest conservation value. (29)

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

47 MDC's GIS Department, Barbara MacFarland, bmacfarland@themdc.com, will provide data sets pertaining to MDC-owned land and watershed areas. (29)

48 Seek information from the Connecticut Department of Public Health (CT DPH) regarding their Source Water Area Protection (SWAP) program. SWAP includes information on community and non-community wells serving <1000 people. If this information is incorporated into the APA layer, then the title of the layer should be modified accordingly.

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

49 If Surface Water Protection Zone layer is intended to cover public surface water supply watersheds, contact CT DPH to see if they will make available information on public surface water supply watersheds. Rename the layer accordingly. Except for land owned by water companies, which is regulated by CT DPH, most public surface water supply watershed land is under private ownership and is not necessarily protected. If the USFS is able to obtain information to create this layer, we would be interested in discussing the ranking scheme associated with it. For obvious reasons, public surface water supply watershed lands should receive relatively high ranking, though perhaps gradated according to the CT DPH categories that pertain to these lands.

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

50 We would be interested in discussing Riparian Zone (300' Corridor). We are not entirely clear as to whether this layer includes all surface water bodies or only rivers and streams. It would seem that this layer should encompass all surface waters, including streams, lakes and wetlands. While we like the idea of including a buffer around these water bodies, we would be interested in having a better understanding of the selected corridor width. Because this layer is tied to our Surface Water Quality Classifications and these reflect designated use goals as well as existing water quality conditions, we would suggest renaming this layer.

Riparian Zones will be ranked 0 to 5, based on the quality of the streams they buffer, these data will be supplied by CT DEP. Buffer width to remain 150 feet, and references to a 300 foot corridor will be dropped, since not all streams are mapped as centerlines. Extra weight of 2 for riparian zones in surface water supply watersheds will be deleted, as it duplicates the consideration given to Surface Water Protection Zones on another layer.

51 CT DEP has 305(b) and 303(d) data for certain waters that have been assessed for attainment of designated use goals. This information is compiled for biennial Water Quality Reports under the Clean Water Act, and includes high quality waters as well as listed impaired waters. This information is not the same as the Water Quality Classifications. If the team wants to include this information as an additional data layer, please contact us to discuss it further.

The team's decision to rank Riparian Zones according to stream quality will accomplish nearly the same thing.

52 We would be interested in knowing why USFS decided not to include the Floodplain (100 year) layer. We think it might be a valuable layer to have even though it may already be partially covered by other categories such as wetlands and valley fill aquifer recharge areas.

Floodplains will be mapped as a separate layer with a weight of 2.

53 We would be interested in knowing what the layer Exceptional Value Streams is intended to encompass and how they are defined. We specifically ask this in light of the fact that 14 miles of the upper Farmington River have been designated as a national Wild and Scenic River. There is a local river overlay zone associated with this designation that pertains to a 100 foot zone on either side of the river.

The upper Farmington River was included with a weight of 5 in the canoe-able streams layer of the Recreation and Cultural Resources Assessment.

Ranking of water resources in Connecticut should be adjusted

54 Rate lands within major reservoir watersheds as highest priority for conservation. (29)

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

55 Water agency holdings on the West Branch of the Farmington River, associated with the West Branch Reservoir and Colebrook River Lake, should be included and given a high ranking; they are potential sources. Holdings surrounding Lake McDonough and at Greenwoods along the West Branch of the Farmington River are not related to water supply, but have high conservation value. (29)

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

56 MDC actively practices forest management on all of its forest lands and considers all forest lands to be very high value. (29)

The team's decision to define Surface Water Protection Zones as the entire basin above a public water supply intake or reservoir, with a weight of 5, covers this request.

57 Delete the extra points for "forest cover" on the Water Resource Assessment; create a separate "Land Use/Land Cover" layer. In this layer, existing preserved forested land would receive the highest ranking, followed by existing unpreserved forested land, etc. This new layer would eliminate the need to award extra points in other layers for forest cover; this would avoid the possibility of double counting forest cover.

The team decided not to delete the extra points for forest cover; the value for water resources of forested land should be included in the Water Resources Assessment.

58 Separate Public Water Supply Protection Zones from Wellhead Protection Zones; there are different regulatory programs associated with surface and ground water drinking sources.



Surface Water Protection Zones will be defined as the entire basin above a public water supply intake or reservoir. Weight will be 5.

59 To eliminate the possibility of confusion, rename “Wellhead Protection Zones” as “Aquifer Protection Areas,” the same term used by Connecticut DEP. Update this layer with the most recent information available, as the APA maps are in the process of being refined from “Level B” to “Level A” mapping.

Wellhead Protection Zone will be re-named Aquifer Protection Areas. Aquifer Protection Areas relate to groundwater resources serving 1000 or more people. Weight will be increased from 2 to 4. Delineation of Aquifer Protection Areas will be provided by CT DEP.

60 The Aquifer Protection Areas represent the State’s most significant groundwater supplies serving >1000 people, these areas should receive the highest ranking, 5.

Wellhead Protection Zone will be re-named Aquifer Protection Areas. Aquifer Protection Areas relate to groundwater resources serving 1000 or more people. Weight will be increased from 2 to 4. Delineation of Aquifer Protection Areas will be provided by CT DEP.

61 B/A waters should be ranked 3 rather than 2, these waters are currently classed as B but the goal is A.

The Connecticut Department of Environmental Protection will provide the appropriate rankings for all classed waters in Connecticut.

62 Certain classifications such as D/A do not really exist although there seems to be some sort of coding artifact in the GIS data base that would indicate it does.

The Connecticut Department of Environmental Protection will provide the appropriate rankings for all classed waters in Connecticut.

63 Adding 2 to water bodies located in surface water supply watersheds would be “double counting” as an “AA” surface water classification (ranked 5) already denotes that it is an existing or potential public drinking water supply.

The Connecticut Department of Environmental Protection will provide the appropriate rankings for all classed waters in Connecticut.

64 As Connecticut’s wetlands classification system is based on soil type, we agree that it should be a separate layer. In light of our comments on riparian zones, the ranking might need to be adjusted.

Wetlands weight will be increased from 1 to 2. If a wetland is forested, add 1. If a wetland parcel is larger than 50 acres, add 1.



65 We like the idea of identifying headwater streams and giving them extra value through the ranking system. We are not entirely clear as to why the stream has a different value than its buffer area.

The team decided to leave the ranking as it is, but to delete the additional 2 points for headwaters streams in a surface water supply watershed, as this is covered by the Surface Water Supply Protection Zone layer

66 We think that perhaps the ‘Masked Layer, Impervious Surface’ would be encompassed by our suggestion for creating a ‘Land Use/Land Cover’ layer.

The team saw no benefit in masking land cover areas classified as impervious surface, effectively giving them a value of zero in the assessment.

67 We would be interested in discussing the layer ‘Masked Layer – Streams Below Water Quality Threshold’ and understanding what triggers placement of a stream in this category. Our assumption is that it might include anything on our 303(d) impaired water bodies list. If the Water Quality Classification goal is to improve water quality, it might be a disservice to give a water body a lower ranking based on current water quality.

Leaving the purposes of The Connecticut Department of Environmental Protection’s classification system aside, the team saw no benefit in masking non-attaining stream segments, effectively giving them a value of zero in the assessment.

68 CT DEP is currently in the process of developing a classification system for Connecticut’s rivers and streams pertaining to streamflow. Streams with natural or near-natural flows would receive a higher ranking than streams with dams or diversions.

Riparian areas are ranked according to stream quality in the Water Resources Assessment. In the Recreation and Cultural Resources Assessment, trout production streams are ranked, and canoe-able streams are ranked. It is not clear what resource values corresponding to ‘natural’ and ‘near-natural’ are missed by the three cases cited above.