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State Wetland Protection

Status, Trends, & Model Approaches

A 50-state study by the
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Appendix: State Profiles

Connecticut

I. Overview

As of the mid-1980s, Connecticut had lost approximately 74 percent of its estimated original wetland area—a higher rate of wetland loss than any other New England state.[1] The state has lost 35 percent of its tidal wetlands since the late 1880s.[2] Currently, wetlands comprise approximately 17 percent of Connecticut's land area.[3] The state has adopted separate regulatory programs for inland and tidal wetlands, both of which are distinct from the federal §404 permitting program under the Clean Water Act (CWA). Tidal wetlands are regulated exclusively by the Connecticut Department of Environmental Protection's (CTDEP) Office of Long Island Sound Programs (OLISP). Regulation of inland wetlands occurs primarily at the municipal level under Municipal Inland Wetland Agencies (MIWA).

II. Regulatory Programs

Wetland definitions and delineation

Connecticut defines "waters" as "all tidal waters, harbors, estuaries, rivers, brooks, watercourses, waterways, wells, springs, lakes, ponds, marshes, drainage systems and all other surface or underground streams, bodies or accumulations of water, natural or artificial, public or private, which are contained within, flow through or border upon this state or any portion thereof."[4]

As previously mentioned, Connecticut regulates tidal and inland wetland activities separately from those covered by CWA §401/404. Authority for these programs is provided by the Inland Wetlands and Watercourses Act (IWWCA),[5] the Tidal Wetlands Act (TWA),[6] and the "Structures, Dredging and Fill Statutes."[7] Under the TWA, the statutory definition of a wetland includes:

> those areas which border on or lie beneath tidal waters, such as, but not limited to banks, bogs, salt marsh, swamps, meadows, flats, or other low lands subject to tidal action, including those areas now or formerly connected to tidal waters, and whose surface is at or below an elevation of one foot above local extreme high water; and upon which may grow or be capable of growing some, but not necessarily all, of the following…[species].[8]

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[1] *See* National Oceanic and Atmospheric Administration, *Habitat Connections: Wetlands, Fisheries and Economics*, *at*, http://www.nmfs.noaa.gov/habitat/habitatconservation/publications/habitatconections/num3.htm (last visited Sept. 10, 2006).
[2] Personal communication with Ron Rozsa, State Coastal Ecologist, Ct. Dep't of Envtl. Prot. (Nov. 7, 2006).
[3] *See* Connecticut Department of Environmental Protection, http://dep.state.ct.us/wtr/wetlands/inland_wetlands.htm (last visited Sept. 10, 2006)
[4] CONN. GEN. STAT. § 22a-423.
[5] *Id*. § 22a-36 *et seq*.
[6] *Id*. § 22a-28 *et seq*.
[7] *Id*. § 22a-359 through § 22a-363f.
[8] *Id*. § 22a-28 *et seq*.

Under the Structures, Dredging and Fill Statutes,[9] the landward boundary of regulation is the high tide line; therefore, activities conducted in tidal wetlands require a tidal wetland permit and a structures and dredging permit. The Coastal Management Act (CMA) establishes policies for other categories of estuarine wetlands (including intertidal flats, eelgrass beds, and estuarine embayments), and the issuance of a permit under the Structures and Dredging and Fill Statutes is contingent upon the proposed activities' consistency with these policies.[10]

IWWCA similarly defines "wetlands" and "watercourses." "Wetlands" include "land, including submerged land, not regulated pursuant to sections 22a-28 to 22a-35, inclusive [tidal wetlands], which consists of any of the soil types designated as poorly drained, very poorly drained, alluvial, and floodplain by the National Cooperative Soils Survey [. . .]."[11] "Watercourses" are:

> rivers, streams, brooks, waterways, lakes, ponds, marshes, swamps, bogs and all other bodies of water, natural or artificial, vernal or intermittent, public or private, which are contained within, flow through or border upon this state or any portion thereof, not regulated pursuant to sections 22a-28 to 22a-35, inclusive [tidal wetlands]. Intermittent watercourses shall be delineated by a defined permanent channel and bank and the occurrence of two or more of the following characteristics: (A) Evidence of scour or deposits of recent alluvium or detritus, (B) the presence of standing or flowing water for a duration longer than a particular storm incident, and (C) the presence of hydrophytic vegetation.[12]

Wetland delineation criteria correspond to the criteria listed within the state statutes.[13] There is no threshold or minimum size or quality requirement for the delineation of wetlands and watercourses. Any wetland or watercourse that can be observed on the ground is subject to state jurisdiction.[14] The Connecticut delineation criteria for wetlands and watercourses almost always exceed the stringency of federal delineation criteria.[15]

Organization of state agencies

Under the IWWCA, regulation of inland wetlands occurs primarily at the municipal level under MIWAs. There are 169 municipalities in Connecticut and a total of 170 MIWAs. Application of the IWWCA varies among municipalities.[16] CTDEP operates a Wetlands Management Section (WMS) that regulates the actions of state departments, agencies or instrumentalities only. Municipal decisions cannot be appealed to CTDEP; all such appeals must go to the state courts. The primary function of the WMS is to assist MIWAs in the administration of the IWWCA, including training and oversight.[17] To carry out these tasks, the WMS has two full-time equivalent staff and an annual budget of $200,000, derived from federal and state grants.[18] The CTDEP's Inland Water Resources Division (IWRD) administers the state's §401 certification program for inland wetlands.

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[9] *Id*. § 22a-359 - § 22a-363f.
[10] Rozsa, *supra* note 2.
[11] CONN. GEN. STAT. § 22a-36 *et seq*.
[12] *Id.*
[13] *Id;* CONN. GEN. STAT. § 22a-28 *et seq*..
[14] Personal communication with Steve Tessitore, Supervising Envtl. Analyst, Ct. Dep't of Envtl. Prot. (July 26, 2006).
[15] *Id.*
[16] *Id.*
[17] *Id*.
[18] *Id.*

Tidal wetlands are regulated exclusively by CTDEP's OLISP with authority from the Tidal Wetlands Act and Structures and Dredging Statutes. OLISP has eleven staff members who work at least part-time on wetland-related enforcement, permitting, restoration, monitoring, and §401 certification.[19] The program's funding is derived from federal grants and, to a small extent, fees and penalties.

§401 certification

The IWRD makes 12-15 individual certifications each year for inland wetlands and approves approximately 85-90 percent of received applications.[20] Less than 5 percent of decisions are waived, and approximately 10 percent are denied.[21] The IWRD relies on a qualitative assessment for §401 certification decision-making. Upon receiving the application and a certified copy of the Notice of Application, a project coordinator reviews the application for sufficiency. If the application is sufficient, a detailed technical review is then conducted, including an evaluation of the technical documentation provided in the application and an assessment of the site, the anticipated effects of the proposed activity, and the proposed impact's mitigation or compensation. If permit issuance is proposed, a draft permit with proposed terms, limitations, and conditions is prepared and made available for review and comment, and the public is given notice of a formal hearing for the application.[22]

Although the TWA is the primary mechanism for protecting tidal wetlands at the state level, state agency staff consider §401 certification as an important element of state tidal wetland protection.[23] The OLISP relies on both qualitative and quantitative assessment to ensure that discharges into wetlands and state waters are consistent with water quality standards.[24] In 2005, seven water quality certification applications were received and four were approved.[25]

General permits

The New England District of the U.S. Army Corps of Engineers ("Corps") has issued a state programmatic general permit (SPGP) to expedite the review of minimal impact projects in coastal and inland waters and wetlands.[26] The SPGP is used in lieu of the federal nationwide permits. The Corps has outlined 38 conditions that apply to all activities authorized under the SPGP. There are two categories of activities that qualify for authorization under the SPGP.[27]

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[19] Personal communication with Peter Francis, Supervising Envtl. Analyst, Ct. Dep't of Envtl. Prot. (Aug. 11, 2006).
[20] Personal communication with Robert Gilmore, Ct. Dep't of Envtl. Prot. (Sept. 12, 2006).
[21] *Id.*
[22] Connecticut Department of Environmental Protection, http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324168&depNav_GID=1643 (last visited Sept. 10, 2007).
[23] Francis, *supra* note 19.
[24] *Id.*
[25] Personal communication with Kristen Bellantuono, Permit Analyst, Ct. Dep't of Envtl. Prot. (Oct. 16, 2006).
[26] Department of the Army Corps of Engineers, *Department of the Army Programmatic General Permit State of Connecticut and Lands Located Within the Exterior Boundaries of an Indian Reservation (2006),* http://www.nae.usace.army.mil/reg/ctpgp.pdf (last visited Sept. 10, 2007).
[27] "Category 1: Non-reporting. Projects are eligible without screening (provided other authorizations are obtained which this permit states are necessary for activities to be eligible for authorization under this category) and do not require notification to the Corps of Engineers. Category 2: Screening/Reporting. These projects require the submittal of an application to the Corps followed by screening the proposal by the Corps, the U. S. Fish and Wildlife Service (U.S. FWS), the U. S. Environmental Protection Agency (EPA), the National Marine

In addition, OLISP has issued a general permit distinct from the SPGP called the Certificate of Permission (COP). The COP was established under the Structures and Dredging Statutes and applies only to tidal, coastal, and navigable waters of the state.[28]

Mitigation

A 1996 amendment to the IWWCA authorizes inland wetland mitigation and establishes the following prioritization for types of compensatory mitigation: restore, enhance, and create productive wetlands or watercourse resources. The state law also provides general standards on mitigation. The state does not participate on a Mitigation Banking Review Team.

OLISP has developed a policy for tidal wetland compensation. Projects must be designed to avoid wetland losses to the fullest extent possible, and compensation is then required for remaining impacts. Only public agency projects with significant public benefit may utilize compensation. Compensation is rare and employed chiefly by the Connecticut Department of Transportation (CTDOT) for essential road and bridge repairs. Wetland losses are tend to be small (on the order of square feet) and compensation typically takes the form of restoration as close to the impact area as possible. OLISP provides CTDOT with instructions regarding the restoration design.[29]

Compliance and enforcement

The IWWCA contains enforcement provisions for violations to the Act. First, a MIWA may issue a written order to immediately cease any activity, facility or condition in violation of the Act or to correct such facility or condition.[30] Second, a municipality may establish, by ordinance, a fine for violating the regulations. According to the Act, fines may not exceed $1,000 for each day during which such violation continues. Persons in violation of the act may

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Fisheries Service (NMFS), and the Connecticut Department of Environmental Protection (DEP). Category 2 projects may not proceed until written notification in the form of a Corps PGP authorization letter is received." *Id.*

[28] CONN. GEN. STAT. § 22a-363b "The following activities may be eligible for a certificate of permission, in accordance with the provisions of subsections (c) and (d) of this section: (1) Substantial maintenance or repair of existing structures, fill, obstructions or encroachments authorized pursuant to section 22a-33 or section 22a-361; (2) substantial maintenance of any structures, fill, obstructions or encroachments in place prior to June 24, 1939, and continuously maintained and serviceable since such time; (3) maintenance dredging of areas which have been dredged and continuously maintained and serviceable as authorized pursuant to section 22a-33 or section 22a-361; (4) activities allowed pursuant to a perimeter permit and requiring authorization by the commissioner; (5) the removal of derelict structures or vessels; (6) minor alterations or amendments to permitted activities consistent with the original permit; (7) minor alterations or amendments to activities completed prior to June 24, 1939; (8) placement of temporary structures for water-dependent uses, as defined in section 22a-93; (9) open water marsh management and conservation activities undertaken by or under the supervision of the Department of Environmental Protection; and (10) the placement or reconfiguration of piers, floats, docks or moorings within existing waterward boundaries of recreational marinas or yacht clubs which have been authorized pursuant to section 22a-33 or 22a-361. Notwithstanding the provisions of sections 22a-29 to 22a-35, inclusive, the commissioner may issue a certificate of permission for activities enumerated in this subsection which are to be conducted in tidal wetlands. Upon issuance, such certificate shall be in lieu of the permit required pursuant to section 22a-32." *Id.*

[29] Rozsa, *supra* note 2.

[30] CONN. GEN. STAT. § 22a-44.

also be imprisoned for up to six months.[31] For subsequent violations, fines of up to $2,000 (for each day of a violation) may be issued, as well as imprisonment of up to one year.[32]

Violations to the TWA can lead to "liability to state for cost of restoration and fine up to $1,000 for each offense (each day of violation is considered a separate offense)."[33] During fiscal year 2005, OLISP issued 22 violations, 5 consent orders, and 2 unilateral orders and conducted 204 inspections.[34] Restoration is required in the case of unauthorized alteration of tidal wetlands.[35]

Tracking systems

The IWWCA requires that MIWAs report all permit and enforcement actions to CTDEP, which then enters the information into a computerized database.[36] Although not required by legislation, a similar system for tracking permits is used by the tidal wetlands program.[37] The MIWAs track mitigation as part of the required permit tracking system. Approximately one-quarter of the MIWAs have staff that track mitigation. The process that the MIWAs use to evaluate mitigation construction and performance vary based on the requirements of each MIWA.[38]

OLISP utilizes geographic information systems (GIS) and an Access database linked to GIS to track all permit actions for both tidal wetlands and structures and dredging, from 1939 to the present. All permit actions are scanned and are retrievable as electronic documents through GIS.[39] The permit information is housed in a project entitled *Coastal Resources*, which provides OLISP staff access to commonly used data layers and images such as aerial photography.

The permitting section of OLISP also utilizes a database to track enforcement actions. In addition, the technical services section of OLISP tracks all habitat restoration activities, including such activities as the restoration of tidal flow to degraded marshes, control of invasive species, and the restoration of submerged aquatic vegetation.[40]

III. Water Quality Standards

Connecticut's water quality standards (WQS) do not identify criteria specific to wetlands; however, the WQS do identify narrative, chemical and biological standards for the state's surface water, which includes wetlands. CTDEP uses WQS along with specific wetlands regulations (i.e., IWWCA and TWA) to guide decisions on the issuance of §401 certification and National Pollutant Discharge Elimination System permits.[41]

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[31] *Id.* § 23a-42(g).
[32] *Id.*
[33] *Id.* § 22a-35.
[34] Connecticut Department of Environmental Protection, http://www.dep.state.ct.us/enf/stat/ffy2005.htm (last visited Oct. 16, 2006). Comparable information was not available for the inland wetland program.
[35] Rozsa, *supra* note 2.
[36] CONN. GEN. STAT.§ 22a-39m.
[37] Francis, *supra* note 19.
[38] Tessitore, *supra* note 14.
[39] Rozsa, *supra* note 2.
[40] *Id.*
[41] Connecticut Department of Environmental Protection, *Water Quality Standards (2002), available at* http://www.ct.gov/dep/lib/dep/water/water_quality_standardsl/wqs.pdf (last visited Sept. 10, 2007).

Connecticut has not adopted wetland-specific designated uses; however, uses for surface waters are designated for each waterbody in the state based on an AA through D classification system for inland surface waters and SA through SD classification system for coastal waters.[42] Specific wetlands may fall within any of these classification groups and thus designated uses differ. Designated uses relate to fish and wildlife habitat, recreation, agriculture, navigation, industry, drinking water supply and shellfishing depending upon the classification.[43]

IV. Monitoring and Assessment

Monitoring and assessment for wetlands

Neither the inland nor tidal wetland program has a state-wide wetland-specific monitoring or assessment program. However, overall wetland gain and loss is tracked by the WMS as part of the permit tracking program sanctioned by the IWWCA and OLISP (See *V. Restoration*). Additionally, Connecticut has completed the National Wetland Inventory and mapping program, which has made available maps for the entire state.

OLISP is currently awaiting the establishment of a general permit for scientific measuring devices in order to begin the creation of a coast-wide network of tidal marsh benchmarks. This technique, which is known as "sediment elevation tables," will be used to track marsh response to sea level rise. Local academic institutions will monitor the position and elevation of vegetation changes in several marshes identified by the OLISP.[44]

The OLISP has also been conducting a general assessment of sudden wetland dieback in Connecticut, as well as tracking marsh submergence, which is confined to the southwest of New Haven. With funding from the U.S. Environmental Protection Agency (EPA), Long Island Sound Study, and U.S. Fish and Wildlife Service (FWS), OLISP has mapped the emergent marshes in six coves using the Cowardin classification. OLISP contributed summer aerial photography from 1974 to the present to these efforts.

CTDEP-IWRD staff have participated in both the National and New England Biological Assessment of Wetlands Workgroups to evaluate pilot wetland monitoring programs in other states. Additionally, CTDEP provided a staff person to work at EPA headquarters for two years on this project. If financial resources are available, CTDEP plans to implement its own wetland monitoring program.[45]

Monitoring and assessment for rivers, streams, lakes, ponds and estuaries

Connecticut's water quality assessment methodology for surface waters, Connecticut Consolidated Assessment and Listing Methodology (CT-CALM),[46] is used for assessing the

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[42] *Id*.
[43] *Id.*
[44] Rozsa, *supra* note 2.
[45] Personal communication with Lisa Wahle, Envtl. Analyst, Ct. Dep't of Envtl. Prot. (Oct. 11, 2006).
[46] CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION, *CONNECTICUT CONSOLIDATED ASSESSMENT AND LISTING METHODOLOGY FOR 305(B) AND 303(D) REPORTING (2006), available at* http://www.ct.gov/dep/cwp/view.asp?a=2719&q=325612&depNav_GID=1654.

quality of surface waters (streams, rivers, lakes, ponds and estuaries)[47] for the state's 305(b) report and 303(d) list, as well as for planning and management.[48] Methodologies outlined in CT-CALM are based primarily on monitoring by the CTDEP and U.S. Geological Survey, with input from state and federal agencies and academic and volunteer entities.[49]

V. Restoration

The state does not operate a formal restoration program for inland wetlands; any inland wetland restoration projects apart from compensatory mitigation projects are carried out by the municipalities. However, the CMA established a policy to encourage the restoration and rehabilitation of degraded tidal wetlands. This Act has been the foundation for the tidal marsh restoration efforts of the CTDEP since 1980.[50]

The primary approach in restoring tidal wetlands has been the restoration of degraded wetlands' tidal flow by removing tide-gates and replacing undersized culverts.[51] With support from the National Oceanic and Atmospheric Administration (NOAA) Coastal Services Center, which provides two-year coastal fellows to states with approved coastal management programs, the OLISP has created a database that tracks tidal wetland restoration projects as "potential, in-progress, or completed."[52]

In the 1980s, there were few dedicated funds available to support tidal wetland restoration. Between 1985 and 1993, many of the wetland restoration projects were completed in partnership with the Mosquito Control Section of the Connecticut Department of Health Services. In 1989, the Connecticut Legislature created the Long Island Sound Cleanup Account (LISCA) to support various estuarine restoration projects. With the increasing number of federal agency grant programs in the 1990s to support wetland restoration, the LISCA became an important source of matching funds that reduced the states' cost for individual projects.[53]

CTDEP also was able to direct funds to scientists at Connecticut College to periodically monitor strategic sites (examples of the different types of restoration as a feedback loop to restoration design). The approach that emerged in Connecticut in the 1980s is to match the tidal flows to the current marsh elevation, or in the case of fill, to match the proposed grades to the existing elevations that can support emergent vegetation. The CTDEP also used photostations at many sites to record the progress of vegetation change, assuming that vegetation could be used as an index of other ecological services. Over time, Connecticut College scientists developed trajectory models for the restoration of various ecological services using data from various

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[47] Though wetlands are included in the definition of surface waters, the "CTDEP does not have the staff or the methodology to monitor or assess wetlands under CALM." Wahle, *supra* note 45.
[48] Connecticut Department of Environmental Protection, *supra* note 46.
[49] Wahle, *supra* note 45.
[50] Rozsa, *supra* note 2.
[51] *See* National Oceanic and Atmospheric Administration, *Connecticut's Dedication to Wetland Restoration*, Coastal Services, *at* http://www.csc.noaa.gov/magazine/2003/02/conn.html (last visited Sept. 10, 2007).
[52] Rozsa, *supra* note 2.
[53] *Id.*

restoration sites and the duration of restoration at these sites.[54] The results of this investigation are presented in *Salt marsh restoration in Connecticut: 20 years of science and management.*[55]

CTDEP also routinely partners with towns and local property owners to obtain support or permission to conduct restoration activities. Unlike other restoration programs, CTDEP does not seek or require conservation easements on tidal wetlands, as the TWA only allows the CTDEP to permit activities that preserve tidal wetlands.[56]

Additionally, Connecticut is a partner to the Long Island Sound Study (LISS), a National Estuary Program restoration initiative formed in 1985 by New York and Connecticut, as well as EPA, non-governmental organizations, and private citizens. In 1994, the LISS provided New York and Connecticut funding to hire staff to develop a bi-state habitat restoration plan. In 1998, LISS provided funding to assist in habitat implementation.[57]

LISS has completed a *Comprehensive Conservation and Management Plan* (CCMP) that seeks to address: hypoxia, habitat restoration, public involvement and education, and water quality monitoring.[58] In 1994, EPA agreed to fund the CCMP recommendation to create a habitat management plan. The LISS then funded a habitat restoration coordinator in New York and Connecticut. In 1998, this Habitat Restoration Initiative switched from planning to implementation and set a ten-year goal for restoration. The current target is the restoration of 300 acres of coastal habitats (i.e., terrestrial and aquatic) by 2011.[59]

VI. Public-Private Partnerships

The federally-funded, state-administered Landowner Incentive Program (LIP) "provides technical advice and financial assistance to landowners for habitat management that will result in the protection, restoration, reclamation, enhancement, and maintenance of habitats that support fish, wildlife and plant species considered at risk."[60] The majority of Connecticut's LIP at-risk species are dependent on early-successional habitats, tidal wetlands, and freshwater wetlands, and so these habitat types have been designated as priority habitats. Interested landowners apply to the Wildlife Division of the CTDEP, which uses a biological ranking system to determine which projects will be issued LIP assistance.[61]

The Connecticut Corporate Wetlands Restoration Partnership (CT-CWRP) was created in 2000 to facilitate wetland restoration projects in the state through public-private partnerships. The CT-

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[54] *Id.*
[55] R.S. Warren et al., *Salt Marsh Restoration in Connecticut: 20 Years of Science and Management.* 10 (3) *Restoration Ecology 10* (3) 497-513 (2002).
[56] Rozsa, *supra* note 2.
[57] *Id.*
[58] Environmental Protection Agency Long Island Sound Office, *About the Long Island Sound, at* http://www.longislandsoundstudy.net/about_liss.htm (last visited Sept. 10, 2007).
[59] Rozsa, *supra* note 2.
[60] Connecticut Department of Environmental Protection, *Landowner Incentive Program, at* http://www.ct.gov/dep/cwp/view.asp?a=2723&q=325734&depNAV_GID=1655 (last visited Sept. 10, 2007).
[61] *Id.*

CWRP seeks to "bring together corporations, state and federal regulatory agencies, academia, conservation groups, community groups, and municipalities to restore degraded wetlands and other aquatic habitat" at both coastal and inland locations.[62] Corporations donate funds and consulting firms donate services (e.g., survey, studies) for restoration projects.[63] CTDEP staff participate on the CT-CWRP advisory board, provide project oversight, and propose projects for funding.[64]

VII. Education and Outreach

The WMS offers training and education programs for MIWA staff. Annual programs cover the administrative and technical requirements of the IWWCA, as well as other related state and federal laws. Additionally, WMS conducts workshops covering a wide range of topics, including: the function and values of wetlands, construction practices and procedures in and around wetlands, and site plan reviews.[65]

VIII. Coordination with State and Federal Agencies

CTDOT and CTDEP have a Memorandum of Agreement relating to regulatory issues.[66] CTDEP also meets with other New England state agencies and EPA four times per year regarding regulatory issues; these meetings are coordinated through the New England Interstate Water Pollution Control Commission and also are attended by Corps and FWS staff. The CTDEP also meets monthly with Corps, FWS, EPA and NOAA staff to screen §404/401 applications.[67]

Additionally, LISS holds a Memorandum of Understanding with CTDEP, New York State Department of Environmental Conservation, EPA Region I and II Regional Administrators, as well as many other federal, state and local agencies, and nongovernmental organizations.[68] Finally, bi-state Habitat Restoration Initiative formed by New York, Connecticut, and LISS meet quarterly to discuss habitat restoration progress.[69] In addition, OLISP convenes a Connecticut tidal wetland restoration workgroup that meets several times a year to discuss progress on wetland restoration projects. The workgroup includes representatives from federal agencies, state agencies, scientists, and nongovernmental organizations.[70]

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[62] Connecticut Corporate Wetlands Restoration Partnership, http://www.cwrp.org/connecticut.html (last visited Sept. 10, 2007).
[63] Rozsa, *supra* note 2.
[64] Personal communication with Christie Bradway, Manager of Envtl. Compliance and Policy, Ct. Corporate Wetlands Restoration P'ship (Sept. 13, 2006).
[65] Connecticut Department of Environmental Protection, *Inland Wetlands Management, at* http://www.ct.gov/dep/cwp/view.asp?a=2720&q=325684&depNav_GID=1654 (last visited Sept. 10, 2007).
[66] Gilmore, *supra* note 20.
[67] *Id.*
[68] Personal communication with Harry Yamalis, Ct. Dep't of Envtl. Prot. (Oct. 16, 2006).
[69] The members of this workgroup are listed on the LISS website. *See* Long Island Sound Study, *at* http://www.longislandsoundstudy.net/habitatteam.htm (last visited Sept. 10, 2007).
[70] Yamalis, *supra* note 68.

IX. Acronyms and Abbreviations

CCMP – Comprehensive Conservation and Management Plan
COP – Certification of Permission
CMA – Coastal Management Act of 1980
CT-CALM – Consolidated Assessment & Listing Methodology
CT-CWRP – Connecticut Corporate Wetlands Restoration Partnership
CTDEP – Connecticut Department of Environmental Protection
CTDOT – Connecticut Department of Transportation
CWA – Clean Water Act
EPA – U.S. Environmental Protection Agency
FWS – U.S. Fish and Wildlife Service
HRI – Habitat Restoration Initiative
ISTEA – Intermodal Surface Transportation Efficiency Act of 1991
IWRD – Inland Water Resources Division
IWWCA – Inland Wetlands and Watercourses Act
LIP – Landowner Incentive Program
LISCA – Long Island Sounds Cleanup Account
LISS – Long Island Sound Study
MIWA – Municipal Inland Wetland Agencies
NOAA – National Oceanic and Atmospheric Administration
NRCS – Natural Resources Conservation Service
OLISP – Office of Long Island Sound Programs
SPGP – Programmatic General Permit
TWA – Tidal Wetlands Act
WHMMP – Wetland Habitat and Mosquito Management Program
WMS – Wetland Management Section
WQS – Water Quality Standards