



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

November 20, 2024

LISoundPlan2025@gmail.com

Mark Tedesco
Director, EPA Long Island Sound Office
Tedesco.Mark@epa.gov

Re: Draft 2024 Comprehensive Conservation and Management Plan (CCMP).

Dear Director Tedesco,

The Council on Environmental Quality (Council) supports the efforts of the Long Island Sound Study (LISS) in their preparation of the draft 2024 CCMP. The Council recognizes the restoration and maintenance of water quality as paramount to the natural and economic services provided by Long Island Sound. The Council offers the following comments regarding the draft CCMP.

Goal 1: Clean Waters and Healthy Watersheds

Goal Statement: Restore and maintain water quality in Long Island Sound and its watershed

- ***Objective 1-Nutrients:*** The draft CCMP states that there has been “a 51 percent reduction in the area of summertime hypoxia that establishes in LIS” (based on the 5-year rolling average), and that the reduction in the area of hypoxia “is ahead of schedule based on the 2015 CCMP which called for a 28 percent reduction”. Although the draft CCMP notes that the goal for the reduction of area of hypoxia in Long Island Sound has been met ahead of schedule, in light of data that indicates the area of hypoxia in Long Island Sound, during the summer of 2023, was approximately 28 percent greater than the previous ten-year average, the Council suggests that the draft CCMP include an updated goal for the further reduction of the area of hypoxia as a measure to assess the results of the proposed actions within this and other objectives in the draft CCMP. The Council also suggests assessing the area of hypoxia as a “*Measure of Success*”.
- ***Objective 2- Watershed Health:*** The Council notes that a “*Measure of Success*” for this objective is the conservation and protection of 5,000 acres of watershed land beyond the coastal boundary. Achievement of this goal would only require an average of 500 acres of land to be preserved annually. As noted in the Council’s 2023 annual report, [Environmental Quality in Connecticut](#), the Connecticut Department of Energy and Environmental Protection (DEEP) has preserved an annual average of 956 acres of land, based on the ten year period 2013-2022, which was significantly short of the annual acreage needed to have met the state’s land preservation goal of 320,576 acres. Further, DEEP has assisted its conservation partners (land trusts, municipalities, etc.) to preserve an annual average of 1,318 acres, based on the ten-year period 2013-2022, which again was significantly short of the annual acreage needed to have met the state’s “conservation partners” land preservation goal of 352,634 acres.¹ The Council supports the preservation of as much watershed land as possible and suggests that the annual acres to be conserved and preserved be reviewed and potentially revised to better reflect the previous level of land conservation in Connecticut and the goals set forth in statute. The Council strongly supports the “*Measure of Success*” for this objective to “*establish and maintain a 100-foot or*

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wider riparian buffer across 75 percent of the waterways and in 90 percent of the subbasins”.

- Objective 3 – Pathogens: The “Measure of Success” for this objective includes achieving “a 5-year rolling average of 85 percent of beaches graded B- and above based on beach data from Sound Health Explorer. Additionally, increase the number of samples collected by 10 percent and increase the spatial coverage of monitoring relative to a 2023 baseline.” The Council questions what a grade of B- represents and suggests that an explanation of the grading system be included in the “*Technical Explanation*” for this objective. The Council also suggests incorporating data for beach closures from the EPA² and the shoreline sanitary surveys, undertaken by the Connecticut Department of Agriculture, Bureau of Aquaculture, as additional sources for assessing the impacts of pathogen loads in Long Island Sound. The Council suggests that the draft CCMP clarify/provide greater detail on how many samples were collected in 2023, and why a 10 percent increase in the number of samples was chosen as a “*Measure of Success*” for the draft CCMP.

The “*Technical Explanation*” states that “*polluted runoff from developed land, leaking wastewater infrastructure, and improperly functioning on-site wastewater treatment systems can release pathogens into water bodies causing closure of beaches and restrictions on shellfishing areas.*” Further, the “*2015 CCMP: Progress by Theme*” states that three ecosystem targets under the “*Clean Waters and Healthy Watersheds*” theme are behind schedule, including approved shellfish area. It is unclear if the targets that were identified in the 2015 CCMP, which have not yet been achieved, will still be pursued. If not, the Council suggests that the draft (2024) CCMP undertake a review to determine if the schedule for the previously stated targets in the 2015 CCMP, under the “*Clean Waters and Healthy Watersheds*” theme, should be extended, or if more aggressive targets should be pursued.

- Objective 4 Toxic Contaminants- The Council suggests that an overarching objective should be to reduce all toxic contaminants from entering Long Island Sound including, but not limited to eliminating combined sewer overflows. The Council notes that the “*Measure of Success*” for this objective is a reduction in “*area*” of impaired sediment in Long Island Sound by an additional 13 percent from the Environmental Protection Agency’s (EPA) 2015 National Coastal Conditions Assessment (NCCA) Data baseline. Further, the “*Technical Explanation*” states that this objective will be measured through the sediment quality index with data provided by the NCCA. The Council notes that the EPA’s NCCA subpopulation selection for the Long Island Sound is either the Northeast, which extends from Virginia to Maine, or EPA Region 1, which extends from New Jersey to Maine. Further, the table on Page 58 states that “*Delineation of LIS in the dashboard is needed to efficiently capture and visualize LIS data*”. The Council questions if 1) it will be possible to measure a reduction of the area of impaired sediment without the delineation of Long Island Sound in the NCCA dashboard, and 2) why a 13 percent reduction of the area of impaired sediment was selected as a “*Measure of Success*” for this objective.
- Objective 5 Marine Debris-The “*Measure of Success*” for this objective is a decrease in “*the mass of marine debris collected per mile during the fall International Coastal Cleanup by ten percent from the 2013 baseline of 475 pounds per mile*”. The Council suggests that the “*Measure of Success*” include the proviso that the marine debris collection efforts not be reduced. The Council suggests that the draft CCMP clarify/provide greater detail regarding the metrics for success, such as why the 2013 Fall international coastal cleanup data is being used as a baseline. Since there have been ongoing efforts to reduce marine debris since 2013, it might be more appropriate to use a more recent survey or an average for the last five years that data are available.

The Council suggests that the draft CCMP also acknowledge and consider the contribution of nutrients,

¹ Connecticut General Statutes (CGS) [Section 23-8\(b\)](#)

² EPA Beach Advisory and Closing On-line Notification; https://beacon.epa.gov/ords/beacon2/r/beacon_apex/beacon2/map-page

pathogens, toxic contaminants, and debris from other states whose watersheds drain into the Long Island Sound, such as Vermont and New Hampshire via the Connecticut River.

Goal 2: Thriving Habitats and Abundant Wildlife

- *Objective 4- Conserved Open Space-* Please see the comment regarding Goal 1, Objective 2 above. The Council suggests review and possible revision of the goal for open space conservation.

Goal 3: Sustainable and Resilient Communities

- *Objective 1: Informed Decision-Makers -* The “*Measure of Success*” for this objective is to “*engage 100 new participants through LISS trainings and resources every year*”. The Council supports this goal and objective and suggests that an additional measure (total of at least 200-400 hours of training each year for new decision makers) might be appropriate. For example, engaging 100 new participants for a ½ hour webinar might be less impactful than 50 new participants for a four-hour training.

Economy:

The draft CCMP states that “*the Sound enriches the economy through a variety of water-dependent industries, yet parts remain as an open space for coastal communities and visitors to connect with nature*”. The Council suggest that the draft CCMP include specific facts/statistics, including an estimate of the Sound’s commercial and recreational monetary value, to highlight the economic importance of Long Island Sound. Such information would better support the statement that “*the wise investment in the natural assets of Long Island Sound and its watershed can secure resilient and sustainable returns in increased property values, water quality, storm protection, recreation and tourism, and other goods and services, particularly during a changing climate*”.

Climate Change:

The Council strongly supports a focus of the draft CCMP to address the impacts of climate change, especially *Goal 3: Sustainable and Resilient Communities*, including the objectives “*Community-Driven Resilience Planning*”, and “*Resilience Initiative Implementation*”. As noted in the Council’s 2023 annual report, [*Environmental Quality in Connecticut*](#), annual precipitation for 2023 was 41.6 percent greater than the annual average since 1960, and the number of days in 2023 with rainfall greater than one inch was 70 percent greater than the annual average since 1960. This extreme precipitation led to combined sewer overflow volume exceeding two billion gallons in 2023, and an increase in the area of hypoxia in Long Island Sound that was approximately 28 percent greater than the previous ten-year average. It is predicted that as the climate warms, severe weather events, such as drought conditions and extreme rainfall, might become more frequent.

Thank you for your consideration of the Council’s comments.



Paul Aresta
Executive Director