Vision, Mission, and Values

	Public Comment	Formal Response
1	Focus on 1. Actionable Science. The additional values are creditable means for achieving goals.	The Partnership sees each value as integral to guiding the operation and activities of the program.
2	LISS should consider adding a DEI statement, or make inclusivity more clear in its vision.	The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated. Commitments to partner with all levels of government, the private sector, and the public remain essential to the plan's values, objectives, and actions.
3	This is an admirable vision/mission, but it is important to ensure it is fulfilled by the program goals and objectives. Under my reading, only 1 of 4 goals addresses the full watershed. Many communities throughout the watershed (including the one I serve--Essex County, VT) are underserved, low income, and reliant on the working landscape. Attempting to restore LIS without addressing these community's needs is a failure to uphold the value of Environmental Justice and will ultimately be less successful by not fostering mutual trust throughout the watershed. I would suggest making all goals applicable to the entire watershed.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
4	Very thorough	Thank you for your comment.
5	This is an admirable vision/mission, but it is important to ensure it is fulfilled by the program goals and objectives. Under my reading, only 1 of 4 goals addresses the full watershed. Many communities throughout the watershed (including the one we serve--Lancaster, NH) are underserved, low income, and reliant on the working landscape. Attempting to restore LIS without addressing these community's needs is a failure to uphold the value of Environmental Justice and will ultimately be less successful by not fostering mutual trust throughout the watershed. I would suggest making all goals applicable to the entire watershed.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
8	Looks great!	Thank you for your comment.
9	This is a great plan.	Thank you for your comemnt.
10	Yes they need a change back toward regulating polluters	Thank you for your comment.
11	The LISS mission is currently as follows: The Long Island Sound Study leads a collective effort to restore and care for the Sound and its watershed. We recommend adding "...restore, care for, protect, and appreciate the Sound and its watershed" to reflect the community's efforts to mitigate future harm to the Sound through our collective efforts to meet the goals of the revised CCMP. These terms already appear under the heading for the Informed & Engaged Public goal.	Through careful consideration of the specific words used in the Mission statement, the Partnership chose to include "...restore and care for..." in order to maintain as broad and comprehensive language as possible. The Partnership considered additional wording to the Mission statement and sought to avoid words and language that may exclude readers from seeing themselves in the mission. In particularly, the program received feedback that some communities may feel the word "protect" has an exclusionary tone. While appreciation is not included in the program mission, it is part of the informed and engaged public goal to to accomplish the mission.
12	Love them! I like the Environmental Justice section, however, I think it could be strengthened with a statement on what EJ is - or naming the fact that Environmnetal injustices exist, and that you seek to help address that.	The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated. Commitments to partner with all levels of government, the private sector, and the public remain essential to the plan's values, objectives, and actions.
13	Goal is appropriate, watershed approach is key, both locally/direct watersheds and the larger/macro LIS watershed. We are all impacted.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
14	I appreciate that the watershed is included in the vision, mission and values. The health of Long Island Sound and our coastal communities depends not only on coastal activities but on those within our entire watershed. Every drop of rain in Connecticut ultimately flows into the Sound. Without protecting and restoring our inland waters and riparian areas, we cannot achieve our goals for a healthier Long Island Sound.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
15	Vision: suggest adding language concerning 'leveraging political will and partnerships with local and regional decisionmakers' - "Long Island Sound and its watershed have clean waters, healthy habitats, thriving wildlife, and resilient coasts, to promote and encourage inclusive access for all, effectively leveraging support from an engaged public and decisionmakers across public and private sectors to ensure its continued well-being." ; Add the word rehabilitate in the Mission Statement: The Long Island Sound Study leads a collective effort to restore, rehabilitate and care for the Sound and its watershed ; Add innovation to Core Values, perhaps to (4) - "Adaptive, Inclusive, and Innovative Management" ... add a third sentence "Incorporate innovative strategies for readiness to evolve with changing landscapes that ensures the most vulnerable are prioritized and stewardship for the Sound is steadfast."	The Vision statement is directed toward the condition of the Sound and its watershed. The values and goals reflect how to achieve that vision, focusing on the Partnership commitment to work closely with federal, state, and local agencies, Tribes/Nations, foundations, non-profits, and universities to coordinate efforts, support decisionmaking, leverage resources and implement the CCMP. Through careful consideration of the specific words used in the Mission statement, the Partnership chose to include "...restore and care for..." in order to maintain as broad and comprehensive language as possible. The Partnership considered additional wording to the Mission statement and sought to avoid words and language that may exclude readers from seeing themselves in the mission. The Actionable Science value already includes "innovate and high-quality science to understand and care for the Sound." While innovation is welcome and encouraged, many elements contribute to wise management and effective implementation.
16	I thought they all added concrete ideas and goals to the first CCMP.	Thank you for your comment.
17	We like them! We also noticed that this is the only mention of Tribal knowledge and values...it just doesn't show up anywhere else. This makes it seem as if LIS is not sacred to those who cared for it and all the ancestral waterways from time immemorial and can help establish place-based resourcing to strengthen communities once again. There needs to be specific mention of Indigenous and regenerative practices that go beyond sustainability in the Goals, Objectives and Actions. If this plan is for the next ten years, then it would be good for LISS to be at the head of the wave. We are no longer able to just do less harm. Restoration of right relationships of humans with the rest of nature is called for and in many ways already here.	The CCMP Values are intended to be applied throughout program operations and activities. The Partnership chose to specifically identify and describe these values at the front of the CCMP to emphasize their importance and cross-cutting nature across each CCMP Goal. None of the values are speficially reiterated throughout the Goals, Objectives, and Actions in an effort to avoid repetitive language throughout the document.

Name Change

	Public Comment	Formal Response
18	[Two memebers] strongly prefer "Long Island Sound Estuary Program/Partnership" and especially keeping the word estuary in the name of the program since it refers to the ecological value of Long Island Sound. While a Sound is an estuary, we feel this word (Sound) is more a reference to the historical and geographical setting of this waterbody. Our work group overwhelmingly supports having estuary in the name to refer to the vast ecology and the delicately balanced natural resources that bring value to our region and what we are looking to protect and conserve.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
19	Emma prefers "Long Island Sound Estuary Partnership" (preferred over program)	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
20	Nancy Seligson likes LIS Restoration Program	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
21	Diana Payne prefers "Long Island Sound Estuary Partnership" and finds restoration to be too restrictive since LISS does more than restore.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
22	Braden prefers Estuary Partnership	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
23	Rodrigo 'restoration' Partnership since LIS can be restored and restore its human users	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
24	Roy Arezzo prefers "Long Island Sound Estuary Partnership" as do Larissa, Erica, Robin, and Diana	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
25	Robin Sanchez - Agrees with comments about the first name. "I think the term estuary is needed".	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.

26	Walter comments that LISP is not a good option for the name due to acronym and agrees with Diana Payne that restoration is too restrictive a word.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
27	Long Island Sound Preservation and Restoration Program – not study program implies ACTION!	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
28	I like Long Island Sound Estuary Partnership best.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
29	Long Island Sound Restoration Initiative	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
30	Long Island Sound Restoration Partnership- implies we all have to work together	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
31	Long Island Sound Study Implementation Project (LISSIP) would keep the heritage and address the action	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
32	LI Sound Partnership. Better: LIS Program	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
33	Long Island has a negative association to many in NYC. To minimize that, maybe just "Open the Sound". With many projects in the works, they are opening to all?	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
34	"Partnership" sounds more established and action oriented	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
35	Long Island Sound Estuary Partnership or Long Island Sound Partnership. I would not use the LISRI and LISRP because it is very similar to the newly formed Long Island Sound Restoration Coalition.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
36	Long Island Sound Restoration Initiative	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
37	It is high time to get beyond "Study"-ing, #3 is best because "Restoration" and "Partnership" are key concepts of the CCMP's goals and plans	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
38	Long Island Sound Restoration Partnership	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
39	Long Island Sound Estuary Partnership – prefer this name as it is not tied to a specific issue with the Long Island Sound. ; I prefer Long Island Sound Estuary Partnership as well because it signifies collaboration among different groups/stakeholders. Initiative seems more for a program that is just launching and using the word restoration seems too limited when the plan has more comprehensive goals (i.e. public engagement, access, etc.) ; Prefer a name including the word 'Partnership' in place of 'Study' as it more clearly associates the entity with a coalition of members and supporting entities and shifts away from a pre-implementation notion. Of the options, I prefer Long Island Sound Restoration Partnership to suggest action via restoration, also a collaborative effort, and feels more publicly comprehensible.	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
40	1ST) LIS RESTORATION INITIATIVE 2ND) LONG ILAND SOUND RESTORATION PARTNERSHIP	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.
41	Long Island Sound Estuary Partnership. Others seem more limited	The program collected feedback on name options through public engagement sessions, a 60-day public comment period, and survey focus groups. After compiling and analyzing feedback from these three mechanisms, the new name selected is the Long Island Sound Partnership. This new name reflects the program's emphasis on partnerships to take action and accomplish the CCMP goals.

Goal Statements

	Public Comment	Formal Response
42	All worthy.	Thank you for your comment.
43	Thank you for the addition of Goal 1, Objective 2 - including the health of the entire watershed as part of the organization's mission. As a community working at the headwaters of the Connecticut River, this will allow us to carry out hugely beneficial projects to restore and protect aquatic ecosystems. Not only will this improve local watershed health, but it will have a positive impact on all the watersheds downstream of us on the Connecticut River and Long Island Sound. The previous focus on Nitrogen reduction made it impractical for us to do any projects using LISS funds. We will now be able to complete ecosystem restoration and protection projects that will have Nitrogen reduction and ecosystem resilience benefits. In addition, pathogens noted in Objective 3 are also a significant problem in the Upper Connecticut watershed, and should be addressed there in addition to just within LIS.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
44	Looks great!	Thank you for your comment.
45	Overall, we believe a more explicit prioritization of water-based recreation would better reflect the current and future uses of the Sound by the public. While recreation is mentioned as a co-benefit, it is not emphasized as an end goal, despite the reasonable expectation of the public to continue to enjoy and appreciate the Sound through water-based recreation. We suggest a more specific definition of public access that addresses recreation, perhaps under the Informed & Engaged Public. Public access implies not only access to beaches but also to the public waters for boating, recreational fishing, and other uses on the water. It further includes visual access to such public amenities as the waters, beaches, and natural resources held by the public or in the public trust. Further, the CCMP should prioritize the protection of water-dependent uses of the Sound and promote siting of new water-dependent uses in suitable locations through, for example, changes to zoning rules.	The Informed and Engaged Public goal, specifically under the Public Access objective, supports water-based recreation that is sustainable and helps raise appreciation and a sense of belonging of the resource that is being protected through the CCMP. The public access definition in the CCMP is kept broad to encompass the wide range of contexts in which the program alludes to public access. The Partnership does not define site-specific public access uses through the CCMP as that decision is left to regional, local, and community partner decisionmakers considering the context at individual sites.
46	These are adequate	Thank you for your comment.
47	3. Sustainable and Resilient Communities: Empower Long Island Sound communities to plan for and respond to environmental challenges in ways that prioritize well-being for all. - suggest adding language for context, such that communities are empowered to maintain active and strategic partnerships with decisionmakers and community based organizations for an influential and proactive role on behalf the health of the Sound. 4. Informed and Engaged Public: Inspire and empower the public to appreciate, value, and protect Long Island Sound and the waters that flow into the Sound. - add something about protecting and improving public access to natural resources for public health, mental well-being, and equity. "Inspire and empower the public to appreciate, value, and protect Long Island Sound and the waters that flow into the Sound through, in part, by protecting and improving public access to natural resources for public health, mental well-being, and equity causes."	- The plan expands upon and provides more detailed context of goal statements within the objectives and actions. The goal statements are meant to be concise action statements. For SRC, the Partnership commits to delivering trainings and providing resources under the Informed Decision-Makers objective so that communities have access to information they need for informed decision-making. The Partnership can serve in a coordinating and information sharing role. For IEP, the Public Perception Survey captures information about well-being and health which will be used to shape programs. The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated.

Missing Topics

	Public Comment	Formal Response
48	Not really, but what do you mean by "restore"? Some of the waters are much improved (thanks to your actions) over the last couple decades. There has to be a better word.	How the Partnership defines "restore" is context-specific, but the term general refers to returning something back to a prior state less or undisturbed by pollution or other environmental pressures. The CCMP includes descriptions of primary measures of success. These primary measures of success explain how the program defines success for each individual objective. Not every objective is meant to focus on restoration, but readers can look to the primary measures of success to see what is meant by "restore" in context of the goals, objectives, and actions. See Goal 2 Objective 1 primary measure of success as an example: "Restore 1,000 acres of coastal habitat in the coastal boundary of Long Island Sound."

49	Oyster reefs- oysters will help to achieve most of your goals . They are a keystone species and will filter the water and improve water quality for other species.	The use of oysters to bioextract nutrients is an activity under action WW 1-1. Restoring natural populations of oysters for ecosystem services is one of the 12 habitat types targeted by the program and is an activity in action HW 1-1.
50	Eutrophication control begins with better agricultural practices upstream to mitigate input. This involves actual demonstration of curbing techniques on fields that allow runoff.	The plan supports your recommendation. The program has supported multiple projects to reduce polluted runoff from agricultural practices throughout the watershed. Reducing nutrients from agriculatural runoff is an activity in action WW1-1.
51	Look great as presented - you only can take on so much.	Thank you for your comment.
52	This plan could benefit from having a goal on timing/policy. This work needs to happen quickly to address environmental crises that significantly impact people, infrastructure, and the environment. With the first CCMP produced in 1994, this provides an interesting opportunity to acknowledge the long-term investment in this work, and despite this massive effort, we're still not where we need to be. This provides leverage to highlight WHY our systems around permitting and funding need to evolve quickly to protect ecosystems and integrate resiliency into vulnerable communities and critical infrastructure.	The CCMP includes timeline goals. The specific objectives are meant to be achieved in ten years (unless otherwise stated). The actions are meant to be achieved in five years.
53	Answered in previous question #7 – incorporate explicit language for goals and related objectives/strategies that will involve decisionmakers and bridge the gap/break down silos for more influence from community-based organizations and advocacy groups that will prioritize equity and inclusive access to the Sound and its shared public resources.	The plan goal under Sustainable and Resilient Communities is to empower Long Island Sound communities to plan for and respond to environmental challenges in ways that prioritize well-being for all. The objectives and actions are intended to broaden participation among decisionmakers and break down silos. The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated.
54	A missed opportunity to improve our waterways involves collaborating with the Connecticut State Health Department to update the state health codes to align with those of our neighboring states. This update should include modern technologies such as low-nitrogen septic system designs. Furthermore, changing regulations requiring home sales to include upgrades to septic systems that meet updated and modern codes is an important goal toward decreasing pollutants that degrade our fresh and salt waters. Several surrounding states already have similar requirements in place.	The CCMP includes reference to modern technologies such as low-nitrogen septic systems under the Nutrients objective. Incorporating advanced treatment for onsite systems is an activity under action WW 1-1. The Partnership will track the number of onsite wastewater treatment systems upgraded with innovate/alternative systems as one measurement of reducing nutrients across the watershed (see WW 1-1 in Appendix B). IEP Action 3-3 also promotes education and outreach for sustainable behaviors including septic tank system maintenance and replacement.
55	The missing Goal: Holistic, Multi-dimensional, Regenerative Transformation.	Clean Water Act section 320 directs National Estuary Programs to consider the ecosystem of the Long Island Sound watershed. As a result, the program aims to have a holsitic approach and view reflected through the CCMP.

Goal 1: Clean Waters and a Healthy Watershed

	Public Comment	Formal Response
56	Suggested rewrite of Objective 1: Reduce nutrients across the watershed to restore and protect water quality and mitigate impacts on ecosystem health in Long Island Sound and its harbors and bays.	Objective 1 was not changed as the objective uses the term embayments which the team feels emcompsses all types of waterbodies within LIS including its harbors and bays. Embayments was added to the glossary as a result.
57	Objective 1: Define and/or give examples of nutrients.	The glossary defines nutrients and gives examples.
58	Objective 2: After the words ecosystem health add (biodiversity and water quality). Request to consider adding "biota abundance" (note from co-chairs: balance technical accuracy and clarity).	Objective 2 was not changed as we use the term "ecosystem health" to encompass all aspects including biodiversity, biota abundance, and water quality. Please see the techincal explanation of this objective for the mention of biodiveristy.
59	Objective 2: After the words positive land use practices add "that ensure resources are used efficiently so the people's needs are met while preserving their future resources to reduce exposure to pollutants, increase habitat, and protect against erosion and storm damage".	The addition of suggested language was added to the technical explanation as well as the objective in Appendix B.
60	Suggested rewrite of Objective 3: Reduce pathogens and increase monitoring to protect water quality and human health, ensuring safety for swimming and fishing.	Thank you for your comment. The rewrite suggestion narrows the objective that has been set, leaving out important uses that should be covered. Therefore, no change was made.
61	Suggested rewrite of Objective 3 Measure of Success: Achieve a 5-year rolling average of 85 percent of beaches graded B- and above based on beach data from Sound Health Explorer through stormwater and wastewater infrastructure improvement projects.	Thank you for your comment. The suggested rewrite of the measure of success would leave out the target of 11,500 OWTS upgrades and the 10% increase of pathogen sampling. Actions under this objective will work towards achieving these measures of success.
62	Suggested rewrite of Pathogens Action 3-1: Evaluate, improve, and support wastewater and stormwater infrastructure improvements, including 11,500 onsite wastewater treatment system upgrades and removals or sewer connections of inadequate onsite wastewater treatment systems located in coastal watersheds.	Thank you for your comment. The suggested rewrite of 11,500 OWTS upgrades would be redundant as this target is included in the measure of success.
63	Suggested rewrite of Pathogens Action 3-2: Increase the number of monitoring samples collected by 10 percent, expand the spatial and temporal coverage of sampling and source tracking relative to a 2023 baseline, and encourage advancements in methodology.	Thank you for your comment. No change was made because the suggested rewrite would be redundant as the target is included in the measure of success.
64	Objective 3 - The measure of success is focused on safety for swimming and does not include a measure of success for safe commercial use (fishing/aquaculture).	The evaluation of the 2015 CCMP Ecosystem Targets identified multiple weaknesses associated with an Approved Shellfish Area target. Actions under the pathogens objective are aimed at reducing pathogen contamination, providing opportunities for NY and CT shellfish departments (Marine Resources/Aquaculture) to open shellfish harvesting waters which following National Shellfish Sanitation Program protocols. Some areas will remain closed despite improved water quality as a preventive measure due to the risk that bacteria contamination could happen (e.g., next to a wastewater treatment facility outfall). These areas would never be opened as long as the outfall existed. While not added to the primary measure of success, the Partnership will track approved shell fishing areas as a supporting indicator, with no numeric target.
65	Suggested rewrite of Objective 4 Measure of Success: Increase the area of sediment in Long Island Sound with good biological condition and low levels of contaminants by an additional 13 percent from the 2015 National Coastal Conditions Assessment Data baseline.	The measure of success has been reworded to read as an increase in the area of sediment in good condition in the Long Island Sound. The biological index has been added as an indicator under the Nutrients objective.
66	Objective 4 - Missing action to "implement reductions" beyond identify.	Thank you for your comment. The objective has been rewritten to include "mitigation" of emerging and legacy toxic contaminants to reduce impacts on water and habitat quality in Long Island Sound. This expands the objective beyond monitoring and research. Details regarding supporting mitigation efforts can be found in Appendix B of the CCMP.
67	Objective 4 - Missing call to educate people and change behaviors.	Please see the Informed and Engaged Public (IEP) goal as it has an objective for sustainable behavior. The Partnership recognizes the need to coordinate activities across goals and to integrate actions that can contribute to multiple objectives.
68	Objective 4 - Ensure "toxic contaminant" is in glossary.	Toxic contaminant has been defined in the glossary.
69	Objective 4 - What about fish/shellfish contamination?	Please see Objective 4, Action 2 as Fish and shellfish contamination is covered there. This action aims to continue collection and evaluation of contaminant data including fish and shellfish tissue analysis. This information can be found in Appendix B of the CCMP.
70	Objective 4 - Impacts on low-income communities should be reflected in actions not just in supplemental documents.	The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated. Commitments to partner with all levels of government, the private sector, and the public remain essential to the plan's values, objectives, and actions.
71	Objective 5 - Add controls (number of people picking up or set sites for projects) in actions. Make success measures quantifiable through these control sites.	The data source we are using is the Ocean Conservancy's International Coastal Cleanup. This database has been used to track progress of CCMP since 2015. The database includes weight of debris collected, distance covered, and number of bags filled.
72	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"	An evaluation of the 2015 CCMP ecosystem targets emphazied that the annual extent of hypoxia is subject to many variables, including seasonal weather patterns, outside management control. The maximum area of hypoxic waters in 2024 was 43 square miles, the third smallest in the 38 years of monitoring. The annual extent of hypoxia will continue to be tracked as an indicator (no numeric target), and focus on long-term rolling averages. The development of a hypoxia indicator for embayments is underway, led by researchers and other partners. Development of the embayment indicator is a priority for the Clean Waters and Healthy Watershed Work Group for FY25.
73	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 Projection (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 wider riparian buffer across 75 percent of the waterways and in 90 percent of the subbasins".	Thank you for your comment. The Measure of Success has been modified to achieve and maintain the permanent protection of 35% of the Long Island Sound watershed by 2035, prioritizing areas that safeguard water quality, support biodiversity, enhance climate resilience, and provide equitable access to green spaces for all communities. Conserving land in key areas prevents habitat loss, reduces pollution from stormwater runoff, and safeguards ecosystems that serve as natural buffers against climate impacts. This target builds upon regional initiatives like "30 by 30," which aim to protect critical landscapes while promoting ecological and community health."

74	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.	Save the Sound's Sound Health Explorer reports the percentage of beaches that earned an "A" or "B" grade, including B-, B, B+, A-, A, A+. This report uses the 5-year rolling averages of percent of beaches graded "A" or "B" (B- and above) data from 2003-2023. The measure of sucess is to achieve 85% 5-year rolling average of beaches graded B- and above based on beach data from Sound Health Explorer . This is an achievable improvement based on the long term trend and is protective of public health. For context, the average 5-year rolling average for 2003-2023 is ~75.5%, while 2023 reported 77.5% EPA Sanitary surveys - All designated public saltwater beaches are required to be monitored under the Federal Beach Act. Data generated for this purpose is uploaded to the EPA database. This data is considered as Save the Sound's Sound Health Explorer pulls data directly from this database for their grades. CT DA/BA sanitary surveys are conducted to assess and update shellfish growing area classifications. Any data generated for these surveys is used to help identify potential sources of contamination and work with local health departments to support shellfish growing areas. Th data are not directly collected for beach closure management and in many cases is not collected from within designated beach areas. As such, it would not be comparable to data used in Save the Sound's Health Explorer beach grades. The Partnership will continue to coordinate with DA/BA in support of maintaining or expanding shellfish growing areas by prioritizing pathogen monitoring in key shell fishing locations. 10% increase context - The 10% increase of sampling was determined using data from the Interstate Environmental Commission's Pathogen Monitoring Network and Save the Sound's pathogen monitoring data from 2023. In 2023, 983 samples were collected across 93 stations in LIS. It was determined that a 10% increase was achievable given the programs' capacity and would help fill geographic data gaps. Shellfish target - The evaluation of the 2015 CCMP Ecosystem Targets identified multiple weaknesses associated with an Approved Shellfish Area target. Actions under the pathogens objective are aimed at reducing pathogen contamination, providing opportunities for NY and CT shellfish departments (Marine Resources/Aquaculture) to open shellfish harvesting waters which follow National Shellfish Sanitation Program protocols. Some areas will remain closed despite improved water quality as a preventive measure due to the risk that bacteria contamination could happen (e.g., next to a wastewater treatment facility outfall). These areas would never be opened as long as the outfall existed. While not added to the primary measure of success, the Partnership will track approved shell fishing areas as a supporting indicator, with no numeric target. Review of 2015 targets - Measures of success for the 2025 CCMP were crafted in part by using lessons learned from an evaluation of the 2015 CCMP ecosystem targets. Some 2015 targets will not be used in 2025 due to multiple weaknesses identified in the evaluation (such as approved shellfish area), while others will continue to be tracked (Sediment Quality Index). Measures of success were developed using SMARTIE guidelines, and are intended to be achievable in a 10-year timeframe.
75	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.	The Partnership utilizes data from 23 spatially-weighted sampling sites made available every 5 years through the NCCA database. The analysis is conducted independantly from the national NCCA report. By spatially-weighing the sites, it is possible to measure a reduction of impaired sediment in LIS. An improvement from 72% good condictions to 85% is based on improvements observed between 2005-2015 (19% reduction of impaired sediment).
76	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 provison 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.	Data from the Fall International Coastal Clean-up is being used because the Partnership can reliably obtain this information annually from Save the Sound and American Littoral Society. The measure of success has been modified to use the five-year rolling average for 2016-2022, which is 174 pounds/mile, as the baseline to assess improvements against. Clean-up efforts understandably dropped during the pandemic, possibly drawing down the trash/mile picked up during that 5-year average. Part of the marine debris objective is to increase clean-up efforts. To address weaknesses associated with using this dataset to track the objective, it is recommended that the Partnership develop a new framework to track marine debris reductions within the next 5 years. This framework will more accurately track reductions in marine debris abundance across LIS and it will be implemented in the second half of the 2025 CCMP. Without a framework to track reductions, there is no other scientifically-backed way to identify a different numeric target.
77	The Council suggests that the draft CCMP also acknowledge and consider the contribution of nutrients, 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.	With the expansion of the geographic boundary to include the upper-watershed states (MA, NH, VT), objectives within the Clean Waters and Healthy Watersheds Goal include contributions from upstream states. The pathogens objective will have a focus in the coastal boundary of LIS, since pathogen sources within the coastal boundary have the largest impact on pathogen contamination in LIS and its embayments. All other CWHW objectives will address issues in the upper-watershed.
78	Restore and maintain water quality in Long Island Sound and its watershed. As you know, the ability to assess and analyze the status of water quality evolves over time. We therefore encourage you to include reassessing and potentially adjusting the LIS 2000 Dissolved Oxygen Total Maximum Daily Load (TMDL) based on upcoming modeling and research in the adaptive management goals of the CCMP. This should include considering revisions to the Nitrogen Trade Equalized Loads zoning and overall process. Given that hypoxic conditions still persist in Western Long Island Sound, it would also be helpful to consider an upper East River (aka Western Narrows)-specific nitrogen load that is more protective than the original set in 2000. We are pleased that the draft CCMP addresses the current and future threats of climate change on water quality. With this goal in mind, in Appendix B for Goal 1, Action WW 2-1 (pg. 51), please add "increased storm surge events and flooding" to the Climate Change Stressors addressed. On the following page, for Action WW 2-2, "Implement nature-based solutions and other practices that improve and maintain water quality and ecosystem health," we suggest adding "using native plant species" to the first and second bullets of the Action Description. Finally, for "Objective WW5: Marine Debris," where it says "Marine debris originates from both land- and water-based sources.... imperfect waste management practices," please consider adding "and generated from wreckage of homes and vessels during severe storms/hurricanes."	Thank you for your comment regarding updating the LIS 2000 TMDL. Efforts to attain and maintain under future conditions nitrogen loading targets supporting water quality standards in Long Island Sound will continue, including assessments of monitoring data and regional water quality modeling tools. "Increasing flooding and storm surge events" has been added to the extreme weather events section in WW2-1. "Using native plant species" has been added to the WW2-2 Action description. We also added "generated from wreckage of homes and vessels during severe storms" to the technical explanation for WW5 in Appendix B.
79	Objective 1 – Nutrients. First of all, the most important objective should be to deal with pathogens. But having said that, reduction in nutrients must start with connecting septic systems to sewage treatment plants AND reducing the nutrient content of effluent from those treatment plants. They contribute as much nutrients to bays as leaching from septics. The installation of N-sparing septics is a failing program. By 2035 it is estimated that only 20% of the septic can be upgraded before the funding runs out.	Both New York and Connecticut continue to use State and Federal funding as an incentive to increase the use of sewers in the Long Island Sound watershed. Currently there are wastewater treatment projects underway. All new and existing discharges from wastewater treatment facilities must meet limits based on the A Total Maximum Daily Load Analysis to Achieve Water Quality Standards for Dissolved Oxygen in Long Island Sound. Unfortunately, there are areas where sewering is not feasible. In these cases, Nassau and Suffolk County have programs to provide grants for homeowners to install nitrogen reducing systems. In New York, the bulk of the nitrogen is coming from Suffolk County and county residents just passed the Suffolk County Water Quality Restoration Act. This landmark Act will generate $4 billion to modernize wastewater infrastructure, expand sewers and finance clean water septic system replacements.
80	Action 1 Objective one states "Implement nutrient reduction actions " under the nutrient reduction actions. This is reiterative, and should explain rather what these actions are (Improve management of stormwater, infrastructure of WWTP, etc.). Currently the objective is to reduce nutrients which is being done by reducing nutrients. The action doesn't get to the heart of HOW	Thank you for your comment. The additional detail suggested can be found in the technical explaination of the objective in Appendix B of the CCMP. This objective description lists multiple implementation strategies to reduce nutrient pollution, including wastewater and stormwater infrastructure upgrades. Additionally, brief context was added to this objective and actions.
81	Thank you for the addition of Goal 1, Objective 2 - including the health of the entire watershed as part of the organization's mission. As an organization working at the headwaters of the Connecticut River, this will allow us to carry out hugely beneficial projects to restore and protect aquatic ecosystems. Not only will this improve local watershed health, but it will have a positive impact on all the watersheds downstream of us on the Connecticut River and Long Island Sound. The previous focus on Nitrogen reduction made it impractical for us to do any projects using LISS funds. We will now be able to complete ecosystem restoration and protection projects that will have Nitrogen reduction and ecosystem resilience benefits. In addition, pathogens noted in Objective 3 are also a significant problem in the Upper Connecticut watershed, and should be addressed there in addition to just within LIS	Thank you for your comment. The 2025 CCMP includes an objective to address the overall health of the watershed. This objective is intended to improve the ecosystem health of LIS and its watershed. The actions incorporate efforts designed to achieve land conservation and protection throughout the watershed as well as those that improve water quality and ecosystem health (of Long Island Sound). Pathogens that originate in the coastal watershed present the greatest threat to Long Island Sound and its embayments. As such, the pathogens objective includes actions that target critical or strategic watersheds where the greatest benefit to LIS and its embayments will be realized and accounted for in the measure of success.
82	May want to address availability and scope of water testing, how hard it is to do, and how to improve it.	Thank you for your comment. The Pathogens objective technical explanation in Appendix B states that the objective aims to enhance understanding and better inform management of pathogen contamination through increased monitoring. WW 3-2 includes method advancements, encouraging and funding research into new and improved methodologies for pathogen detection and source tracking, including molecular techniques and rapid testing methods. The overall goal to increase monitoring is supported by increasing the availability and ease of pathogen detection.
83	My suggestion is to include a focus on data collection in areas that are in underserved, overburdened areas as they are more likely to be contaminated by industrial development. My town of East Haven, for example, is dealing with a proposed airport expansion. Airports are known to be sources of many dangerous toxins and ours is located in a wetland right next to the sound. The proposed expansion will disturb soils that contain legacy toxins as well.	The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated. Commitments to partner with all levels of government, the private sector, and the public remain essential to the plan's values, objectives, and actions.
84	With the upcoming administration and potential cuts to high resolution mapping projects, are you concerned that you might not have the necessary resolution for the "Measure of Success: Conserve and protect an additional 5,000 acres of watershed land beyond the coastal boundary. Establish and maintain a 100-foot or wider riparian buffer across 75 percent of the waterways and in 90 percent of the subbasins." goal? Should you change it to a wider buffer to accommodate for the potential lack of high resolution mapping?	New administrations are part of the democratic process and the Partnership does not speculate on what policy consequences may arise. The Partnership will continue to rely on the best available data and resources to achieve the stated goals and believes that the current buffer targets are both achievable and effective for improving watershed health. The Partnership remains open to adaptive management strategies and will reassess goals and methodologies if significant changes in data resolution or resources occur.

85	It's very clear. I saw that CSO's were mentioned, but I think it could be included more strongly, as that is an issue related to water quality and environmental justice.	Thank you for your comment and for highlighting the importance of addressing CSOs as they relate to water quality. In 1994, the USEPA adopted a CSO Control Policy that established minimum requirements for CSO communities to achieve and set forth goals that would allow for the communities to achieve the goals of the Clean Water Act. Regionally, EPA reviews permits and consent decrees issued by CT DEEP and NYSDEC for CSO mitigation consistent with that policy. Each year, NYSDEC collects and summarizes data received in each municipality's CSO Best Management Practice annual report to produce the statewide report. This report includes overall CSO program implementation status, quantification of LTCPs, CSO Outfalls, and CSO permits. Community-specific data & information for CSO program progress is also included. See https://dec.ny.gov/sites/default/files/2024-11/cso2023annual.pdf. CSO discharges from New York City were included in the 2000 Nitrogen Total Maximum Daily Load and are subject to load reductions. In CT, six municipalities have CSOs. The Clean Water Fund for wastewater projects, administered by CT DEEP, has provided critical support for advancing CSO mitigation projects. In the last 20 years, a total of approximately 1.2 billion dollars have been spent on statewide CSO reduction or elimination projects, of which approximately 470 million dollars consisted of state grants through the Clean Water Fund. Reduction of CSOs to a 1 or 2-yr design storm as well as projects to fully eliminate CSOs statewide will likely take several decades to plan, design, construct, and finance additional CSO projects with additional cumulative costs in the billions. CT DEEP continues to prioritize CSO projects to achieve environmental improvements and meet the state's water quality goals. Your input reinforces the importance of these partnerships in advancing shared goals. EPA, NYSDEC, and CT DEEP will continue work to oversee CSO work.
86	Audubon supports using conservation and land stewardship to improve the ecosystem health of Long Island Sound and its watershed, as outlined in Objective WW 2: Watershed Health. The portion of the watershed in Connecticut alone contains 40 Important Bird Areas (IBAs). IBAs in Connecticut are identified using a set of standard criteria that pertain to at-risk species, congregations of birds, and suites of birds representing particular habitats. IBAs identified for forest birds are large, intact forest expanses that provide habitat for a suite of forest birds of regional conservation responsibility. Forested IBAs in Connecticut include the Lyme, Macedonia, Meshomasic, and Shepaug Forest Blocks. In forested landscapes, management to improve water quality is highly compatible with management for wildlife habitat, climate resiliency, and more. Therefore, ongoing stewardship and management of conserved lands, as mentioned in Action WW-2-1, is important for maintaining the long-term health of the watershed as well as for improving habitat conditions. The land use data collection and analysis outlined in Action WW 2-2 can help inform conservation action across the watershed. The goal of maintaining riparian buffers of at least 100 feet across 75% of the waterways is aligned with best practices for forest bird habitat management. Audubon recommends that forest riparian buffers be at least 50 feet wide, or ideally greater than 200-300 feet where possible. Many species of birds use these buffers as habitat during breeding and migration, as well as travel corridors for fledglings.	Thank you for taking the time to comment.
87	Goal 1: Clean Waters and Healthy Watersheds; Objective 1: Explore pay for success (pay for performance) policy to advance this work from a procurement/contract standpoint	Thank you for your comment. The Partnership will share this feedback with its partner organizations responsible for administering funding programs.
88	Watershed Health - Agree with "Preserve, restore, and steward natural landscapes and the ecosystem services they provide through land conservation and protection efforts beyond the coastal boundary." Greater efforts needed/collaboration with Pollinator Pathway/Doug Tallamy's Homegrown National Park and other efforts, either regulatory/restrictions or encouragement/"the carrot" to change lawn/turf spaces close to water - streams/rivers/coastal - to reduce pollution runoff, to instead retain or rebuild natural riparian buffers. Better connections and partnerships with lawn care & landscaping sectors. Stronger invasive plant laws, reduce chemical fertilizers & pesticides usage allowed close to water.	Thank you for your comment and input. The topics you raise are all activities supported by actions in the plan.
89	Based on its Combined Sewage Overflow (CSO) Long Term Control Plans (LTCPs), New York City estimates it discharges 10.8 billion gallons of untreated sewage and polluted stormwater into waters that influence water quality in Long Island Sound: the East River, Harlem River, Bronx River, Westchester Creek, Alley Creek, Flushing Bay, Flushing Creek, and Hutchinson River. Riverkeeper has estimated that volumes are in fact substantially higher. In any case, these discharges represent nearly two-thirds of the total volume of CSO discharges from New York City annually. After LTCPs are implemented, the city estimates it would continue to discharge 9.2 billion gallons of CSO to these waterways, and a portion of the treated wastewater discharge will not be subject to treatment for nutrient removal. The need to further reduce these discharges with meaningful, incremental progress toward New York City's goal of eliminating CSO discharges by 2060 should be reflected in Goal 1, Objectives 1 and 3 of the CCMP. Measures of success essential to meeting these objectives include: Implement the Renewable Rikers project, which would modernize the treatment of 700 million gallons per day of waste currently processed at Hunts Point, Tallman Island, Bowery Bay and Wards Island treatment facilities, and reduce CSO discharges to the East River/Western Narrows and its tributaries. Update Water Quality Standards for New York State's saline waters, including the East River/Western Narrows, and its tributaries, to "swimmable" (Class SB or SC), and ensure that Water Quality Variances or Use Attainability Analyses require incremental, meaningful improvements toward New York City's goal of eliminating CSO discharges by 2060. Add tertiary treatment to remove nitrogen from wastewater effluent at New York City's remaining wastewater treatment facilities. The city's Newtown Creek facility is the largest contributor of nitrogen to the East River, followed by the Wards Island and Bowery Bay facilities.	Thank you for your comment and for highlighting the importance of addressing CSOs as they relate to water quality. Action WW 3-1 relating to pathogens highlights the need to evaluate and improve wastewater and stormwater infrastructure, including activities to implement infrastructure improvements and abate combined and sanitary sewer overflows in support of approved long-term control plans and municipal separate stormwater sewer system permits. Specific activities, including the projects mentioned (Renewable Rikers, further tertiary treatment) will be evalutated as part of Action WW 1-1. Your input reinforces the importance of these partnerships in advancing shared goals. EPA, NYSDEC, and CT DEEP will continue work to oversee CSO work. Regarding water quality standards in New York saline water: On July 27, 2022, NYSDEC issued an Advanced Notice of Proposed Rule Making (ANPRM) with the New York State Department of State. The ANPRM was a data gathering and public outreach exercise intended to inform future reclassification and water quality standard rule makings applicable to saline waters of the State. This ANPRM closed on November 28, 2022. On March 28, 2023, NYSDEC filed a Notice of Proposed Rule Making with the New York State Department of State to amend Parts 701 and 703 of Title 6 of the Official Compilation of Codes, Rules, and Regulations of the State of New York (6 NYCRR). Effective on October 18, 2023 upon publication of the State Register, the New York State Department of Environmental Conservation (NYSDEC) filed a Notice of Adoption with the New York State Department of State to amend Parts 701 and 703 of Title 6 of the Official Compilation of Codes, Rules, and Regulations of the State of New York (6 NYCRR). The adopted regulatory updates to 6 NYCRR Parts 701 and 703 include water quality standards to protect the shellfishing best use in Class SA waters; protect the primary contact recreation best use in Class SA and SB waters; maintain water quality suitable for primary contact recreation in Class SC waters; protect the secondary contact recreation best use in Class I waters; and add a wet weather (WW) limited use designation for waters impacted by combined sewer overflow discharges. Following the decision to adopt this rule, the Department began work on a second planned rule making that will modify classifications of the State's saline waters to better align with existing uses and water quality improvement goals for those waters. Western Long Island Sound and the portion of the East River from the Whitestone Bridge east are Class SB and protected by water quality standards compatible with the CWA 'swimmable' goal. The remaining portions of the East River, currently Class I, are under examination by NYSDEC for reclassification, but a final determination on their future Class has not been made. It is NYSDEC's goal to apply classifications protective of full primary contact recreation wherever those standards are projected to be attainable under the currently approved long-term control plan (LTCP). Waters that cannot be upgraded to Class SB or SC will have a Use Attainability Analysis (UAA) or Water Quality Standard Variance drafted to support their highest attainable use and/or condition.
90	We applaud the inclusion of looking all the way up the watershed in this version of the CCMP. As stated earlier, the health of Long Island Sound and our coastal communities depends not only on coastal activities but on those within our entire watershed. Every drop of rain in Connecticut ultimately flows into the Sound. Without protecting and restoring our inland waters and riparian areas, we cannot achieve our goals for a healthier Long Island Sound. In particular the recognition of riparian buffers as an essential, INEXEPENSIVE, and VERY EFFICIENT tool for maintaining healthy waters and improving waters with nutrient impairments. The percentage goad of establishment of buffers is ambitious but I think ambitious goals must be set to enact change. It should be clear, however, that buffer width should be appropriate to the resource.	Thank you for your comment. We agree that the health of Long Island Sound and our coastal communities is influenced by activities within the entire watershed and that protecting and restoring inland waters and riparian areas are important objectives.
91	Include fostering and promoting aquaculture operations to reduce nutrient levels. ' I think it would be helpful to clarify that Objective 1 is to reduce excess nutrients and define eutrophication. Stating the goal as simply to reduce nutrients may be confusing to a member of the public or student reading this document as the word "nutrients" has the connotation of being good and healthy in terms of personal health. ; In objective 2, could the concept of "positive land use practices" be explained/defined? ; Incorporate language to objective #2 to build on what "positive land use practices" means and add "… through conservation, positive land use practices, and public-private investments." Strategies can expand on this to talk about public-private partnerships to replace failing or aging individual septic systems and expand connections for public wastewater infrastructure, and capture conservation areas under practices enacted by local governments such as TDR programs or managed retreat to protect watershed land.	We have added the term "bioextractive aquaculture" to the action description for WW 1-1 in Appendix B. Eutrophication is defined in the glossary and has been added to the technical explanation of the nutrients objective. The technical explanation of objective 2 includes examples of positive land use practices including enhancing riparian buffers, increasing urban canopy coverage and land conservation and protection, and implementing sustainable land management practices to help stabilize shorelines, filter pollutants, and reduce stormwater runoff. Finer examples are provided in the WW2-2 action description, including: Install green infrastructure such as rain gardens; and green roofs to reduce runoff and filter pollutants; Establish and maintain riparian buffers along waterways to intercept pollutants and stabilize stream banks; Implement techniques like installation of permeable surfaces and tree filters to disconnect stormwater systems and reduce the effective area of impervious surfaces; Restore and create wetlands to enhance water filtration and provide flood protection. Public-private partnerships are an identified funding source for land acquisition in WW2-1 in Appendix B of the draft CCMP. As the objective is written, "public-private investments" is covered by the term "conservation," and included as a funding source in the technical description of WW2-1.
92	The comments above in 8 would help address a significant source of pollutant. Another concern is the impact of the 830G housing initiiative which removes the ability of communities to protect fragile wetlands and water courses with high density housing, even in documented watershed lands.	Thank you for your comment. The Partnership will share this feedback with its partner organizations responsible for wetlands management.
93	Healthy watersheds also need estuarine buffers. Riparian buffers are good, but not enough. Buffers around wetlands are also crucial to maintain for watershed health and climate resilience. Also you should include partnerships with Tribal Nations, whose shared question is, "how can we tend to ancestral waterways we no longer can access or control?"	Thank you for your comment. We agree that the health of Long Island Sound and our coastal communities is enhanced by protecting and restoring riparian areas are important objectives. The Partnership is actively working to increase engagement with Tribes/Nations.

Goal 2: Thriving Habitats and Abundant Wildlife

	Public Comment	Formal Response
94	Clarify if the action is "restoring coastal habitat" or "supporting projects." Suggested rewrite of Coastal Habitat Action 1-1: Support projects that implement established coastal habitat restoration techniques or help advance innovative techniques and include broad collaboration and communication.	Action HW 1-1 was not changed because by removing "restoring coastal habitat" from the action, we omit the purpose of the action. The technical explanation for Action HW 1-1 provides more information as to what activities should be completed under the action. For example, activities under this action include, but are not limited to, restoring habitat to protect Species of Greatest Conservation Need, reducing invasive species abundance; enhancing ecosystem services provided by coastal habitat; exploring innovative techniques for future restoration; and collaborating with partners to increase efficiency and achievements.
95	Objective 1 - A reference to the template would be helpful to understand the timeline.	The CCMP includes the objective and action technical explanations under Appendix B.
96	Objective 1 - Add "promote biodiversity" to objective.	The term "wildlife" has been added to the Glossary to specify that both animals and plants are included. Additionally, improved biodiversity is an ecosystem service provided by coastal habitat and therefore falls under the scope of the Coastal Habitat Objective (see Objective HW 1 technical explanation in Appendix B for more details).
97	Objective 1 - Update 1000-acre reference to a percentage of the total coastal boundary - Is this relatively big or small?	This measure of success builds off of the 2015 CCMP by aligning with past habitat restoration achievements of approximately 100 acres of coastal habitat restored per year. The CCMP provides this context in the Objective HW 1 technical explanation in Appendix B.

98	Objective 1 - Make a specific note on resiliency to a changing climate.	In Objective HW 1 technical explanation, text has been added to capture the need for coastal resiliency to adapt to exteme weather events. The sentence now reads, "In addition to restoration, this objective also includes coastal habitat extent where the Partnership is prioritizing the protection and enhancement of coastal habitat, thereby providing resiliency to extreme weather events."
99	Objective 1 - Strive for one measurable objective statement, consider moving targeted habitat types to technical document or actions if relevant.	The CCMP includes one sentence objective statements followed by more context relating to the measure of success, justification, and other supporting environmental indicators. Each objective focuses on different habitat types which are specifically called out in the technical explanations (see Appendix B).
100	Objective 1 - Where possible, make actions measurable (e.g., number of restoration projects, number or area of living shoreline projects).	While these measurements have been added to the performance metrics for each action, the Partnership has refrained from adding a target number as the actions are to be more general and flexible. While there will be no target number, these identified performance metrics will be tracked by the Partnership to evaluate the progress of each action.
101	Objective 1 - In Measure of Success, define or give examples of ecosystem services.	Ecosystem services is defined in the Glossary as "the processes by which the environment produces resources that support human well-being such as clean water, timber, habitat for fisheries, flood management, natural spaces for recreation, and pollination of native and agricultural plants." Under the Objective HW 1 technical explanation (Appendix B), examples of ecosystem services have been added specific to coastal habitat restoration.
102	Objective 2 - Should this reference the Blue Plan?	Under the Objective HW 2 technical explanation (Appendix B), the Blue Plan is referenced in the following sentence, ". Furthermore, the Partnership will support and encourage partners to preserve biodiversity of habitat and wildlife through the implementation of the regional plans, like the Long Island Sound Blue Plan and New York Ocean Action Plan, designation of protected areas and buffer zones (e.g., CT NERR), and implementation of federal, interstate, and state species management plans."
103	Objective 2 - Actions lack specificity, especially responsibility - what does success look like in 10-years?	In the CCMP, each action technical explanation provides more specificity in description, activities, and cooperators and partners responsible. For Objective HW 2, success in 10 years looks like a framework of seafloor habitat mapping, data collection, and species assessments to better understand and manage the resources dependent on these diverse habitats. All of which have been clearly reflected through the objective and associated action technical explanations.
104	Objective 3 - There are several terms that need to be defined for a non-scientist to understand Objective 3. For example, connectivity and habitat patch.	The Glossary defines "habitat patches" as "a discrete habitat area (or patch) that is isolated." "Habitat connectivity" is discussed under Objective HW 3 technical explanation (Appendix B), but is now also included under the Glossary as "refers to how and to what degree distinct habitat patches are connected, which influences the distribution, genetic diversity, and health of wildlife."
105	Objective 3 - Enhanced biodiversity should be included as a measure of success.	Measuring biodiversity would not fit under SMART requirements as the Partnership does not have the data to report on this as a measure of success. However, increased biodiversity is a natural result of connecting habitat patches and reconnecting migratory pathways. If such data becomes available in the next 10 years, the Partnership can add it as a supporting environmental indicator for Objective HW 3.
106	Objective 3 - It is not clear how protecting patches increases connectivity.	The following sentence has been added to the Objective HW 3 technical explanation to provide more context, "Protecting existing coastal habitat patches (i.e., discrete habitat areas that are isolated) prevents loss of areas where connections can be restored. Restoring areas between isolated habitat areas increases the habitat connectivity (i.e., contiguous acres of coastal habitat protected or restored)."
107	Objective 3 - There is a need to describe the context of baselines. For example, it is not clear what restoring/protecting 100 habitat patches represents for LIS.	This measure of success tracks with current program objectives and aligns with past habitat restoration achievements of approximately 10 habitat patches restored/protected, 17.5 miles reconnected, and 10 barriers removed per year. This context is provided in Objective HW 3 technical explanation (Appendix B).
108	Objective 3 - Utilizing river herring productivity potential to help measure the success of habitat restoration efforts - the timing is essential because at-sea effort will be reduced - this would help to point where the problems lie.	This data does not meet the SMART requirement to be listed as a measure of success. If the data is to become available in the future, the Partnership can utilize it as an supporting environmental indicator.
109	Objective 4 - Objective would be clearer if open space, high priority, and protected land were defined.	The term "Open Space" has been added to the Glossary as "includes all unbuilt areas, whether publicly or privately owned, protected, or unprotected."
110	Objective 4 Measure of Success - The area 5,000 acres is mentioned without any context, i.e., it is not clear what portion of the coastal boundary it represents.	The measure of success needs to be realistic and achievable, and is based on the average of the previous 5-10 years of restoration and acquisition metrics. This context is provided in the Objective HW 4 technical explanation (Appendix B).
111	Objective 4 - Being more inclusive about who is taking actions beyond LISS for Thriving Habitats and Abundant Wildlife goal would improve specificity.	Each action technical explanation (Appendix B) includes a list of cooperators and partners who will or could be involved in implementation of the action. However, the Partnership encourages others to help implement these actions as the plan is made to be inclusive.
112	Objective 4 - Unclear what is meant by “maintaining and enhancing the total area of protected land”.	"Maintaining and enhancing the total area of protected land" means that of the open space already protected, there are no losses of these lands. Furthermore, the Partnership aims to continue to maintain and enhance these lands (i.e., removal of invasives, habitat enhancements, etc.). More context is provided in the objective HW 4 technical explanation (Appendix B).
113	Objective 4 Action 4-1: Do plans exist already, if so how much high-priority coastal land is identified and how much will be protected from development?	Both New York and Connecticut have their own State plans: New York's Open Space Conservation Plan and Connecticut's Comprehensive Open Space Acquisition Plan (2016-2020 Green Plan) (Update in Progress) in which this CCMP intends to support the implementation of those plans as well. The Partnership works with the States to identify these high-priority coastal habitats based on their priorities and plans.
114	Objective 4 Action 4-2: How will equitable access be increased and by how much?	Under the Informed and Engaged Public Goal, there is an objective dedicated to Public Access and Sense of Belonging. Recognizing the overlap between the Public Access and the Conserved Open Space objectives, under the Objective HW 4 technical explanation and following the SMART requirement, the objective aims to conserve 5,000 acres of open space in the coastal boundary of Long Island Sound. Of the 5,000 acres to be conserved, at least 40 percent will be in areas where communities have not typically benefited from conservation projects.
115	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.	The HW 4 Objective, Conserved Open Space, is specific to the coastal boundary of the Long Island Sound. The measure of success, 5,000 acres conserved by 2035, was selected as it tracks with current program objectives and aligns with past habitat restoration achievements of approximately 500 acres conserved per year.
116	Goal 2: Thriving Habitats and Abundant Wildlife Restore and protect the health and resilience of habitats and wildlife in Long Island Sound andits ecosystems. Save the Sound appreciates that the CCMP works towards diversity, equity, inclusion, and justice in decisions considering the protection and management of habitats and wildlife across the region. We strongly support actions set forth in Objective 4 (pg. 12) to “increase equitable access and enhance sustainable stewardship of conserved lands particularly for historically underserved and overburdened communities.” To this end, we would like to suggest a review of each Action to consider where Tribal Nations should be considered as "Cooperators and Partners." It would also be helpful to identify which specific LISS grants would be relevant for each Action under "Funding Sources." We are pleased to see that of the “5,000 acres to be restored, at least 40 percent is to occur in areas that are accessible to underserved communities.” (pg. 88) We reiterate the importance of this for promoting public access to open space for urban or underserved communities. Including a plan for tracking this goal would help to ensure greater equity in access to greens paces. Finally, in the Appendix for Goal 2, for Action HW 1-3 (pg. 75), where it says, “Develop salt marsh health monitoring metrics,” we recommend explicitly defining salt marsh health by describing the conditions that foster salt marsh longevity and productivity. This would support the more sufficient development of metrics for monitoring those specific conditions.	Each action technical explanation (Appendix B) includes a list of cooperators and partners and now lists "Tribes/Nations" to collaborate with. For funding sources, the Partnership decided to keep this broad as well since it should not be an exhaustive list. The Partnership plans on tracking this percentage through our internal tracking and reporting tool which includes all federal funds spent. The reported acres conserved will be cross-referenced with state partner maps and tools to identify communities with limited access. The Partnership is currently funding several projects that will define salt marsh health monitoring metrics specific to Long Island Sound (Lead: The Maritime Aquarium). Based on the results of this project, the Partnership will adapt these metrics for future salt marsh monitoring projects. This information has been added to the Action HW 1-3 technical explanation.
117	10 Goal 2: Thriving Habitats and Abundant Wildlife. Totally ignores marine life! Wildlife is not really defined. Under the second objective we find: "management projects focused on seafloor habitat mapping, data collection, and species assessments", but wildlife both shore and marine bottom should be the focus!	The term "wildlife" has been added to the Glossary to specify that both animals and plants are included. Objective HW 2, Offshore Habitat, focuses on the habitat, like the seafloor, that is found in the Open Sound. While, Objective HW 1, Coastal Habitat, focuses on coastal habitat (e.g., shore). Both wildlife within the coastal and seafloor are addressed in the CCMP.
118	Expanding the focus of this goal to include the rest of the watershed would improve its impact. Ecosystems are incredibly intertwined, and improving habitat in any part of the watershed will be helpful to Long Island Sound.	Under the Clean Waters and Healthy Watersheds Goal, the Watershed Health Objective focuses on the habitat restoration with the intent to improve water quality. The Thriving Habitats and Abundant Wildlife Goal focuses on the coastal boundary with the intent to restore and protect habitat and wildlife.
119	See Titus Mill Pond comment below	Under the Clean Waters and Healthy Watersheds Goal, the Marine Debris Objective addresses pollution related to trash.

120	My concern is the health of the whales. When wind turbines were explored for energy, it appears the whales were ignored in any impact study & this remains so today. Wind turbine arrays produce high sound frequencies that interfere with echolocation of the whale family. When whales get stressed they beach & die. This is what happens when society rushes to what they think is a panacea for other problems & then realizing the catharis created tries to misinform the public that there is no connection. This is not the logical fallacy of correlation-causation. Whales have specific echolocation assets that they can even distinguish between an oil slick & clear water. So this big plan to build all these wind farms needs to consider this	There are currently no wind turbines or proposals to build wind turbines in the future in Long Island Sound. Wind turbines proposed and being built in the region are offshore and out of the Long Island Sound boundary. The comment, therefore, is outside of the scope for the CCMP.
121	Expanding the focus of this goal to include the rest of the watershed would improve its impact. Ecosystems are incredibly intertwined, and improving habitat in any part of the watershed will be helpful to Long Island Sound.	Under the Clean Waters and Healthy Watersheds Goal, the Watershed Health Objective focuses on the habitat restoration with the intent to improve water quality. The Thriving Habitats and Abundant Wildlife Goal focuses on the coastal boundary with the intent to restore and protect habitat and wildlife.
122	Consider working with CAA on preservation of the Groton Airport as a coastal resource.	Coastal resources is a specific definition in the Section 22a-93(7) of the Connecticut General Statutes under Connecticut's Coastal Management Act. It would require a congressional change to preserve an airport "as a coastal resource". With this being said, this is out of scope for the CCMP. The CCMP works in accordance with existing state laws. Preservation of an airport as a coastal resource is inconsistent with current state law.
123	Love it, especially the Habitat Reconnectivity action! I really appreciate the strong focus on dam removals.	Thank you for your comment.
124	Under Thriving Habitats, Objective 1 – Coastal Habitats – Audubon would like to see the words "management" and/or "stewardship" included. The work Audubon does to protect beach-nesting birds isn't restoration. Management or stewardship of federal and state listed species that utilize LIS is ongoing work. Under Thriving Habitats, Objective 2 – Offshore habitats. The focus seems to be on underwater habitats, but what about offshore islands? Offshore Islands are facing major threats due to SLR and more frequent and intense storms. They provide important habitat for birds as well as absorb wave energy, protecting coastlines. If possible, please call out in this section.	The Partnership does not have the authority to manage wildlife. However, by managing habitats, through restoration and protection, the Partnership is able to enhance habitat provisioning services for wildlife. Management and stewardship activities are highlighted in Actions HW 4-1 and 4-2. Objective HW 4, Conserved Open Space, includes habitat in the coastal boundary. Please see Appendix B for more details. Offshore islands are included under the 12 priority coastal habitats which is listed under Objective HW 1, Coastal Habitat.
125	Goal 2: Thriving Habitats and Abundant Wildlife; consider creating a new objective for 'streamlining permitting pathways' for ecological restoration (currently under objective 3) as this impacts all performance metrics under this goal. I'm available to meet with folks on the team to explore this and provide more information/guidance; Appendix, Action HW 3-3 Action – consider adding two actions to this list: (1) permitting timelines (collecting more information on how long it takes to write permits, submit permits, review permits, and receive permits), and (2) exploring the use of a state and federal programmatic review to cover the priority ecological restoration work identified by this CCMP. Performance measures – it's worth adding a performance metric here on 'permits issued under 1 year'. It's important to note that this metric won't explain the whole story and that even if permits are issued under a year, it could still take A LOT of effort to submit a permit application, so time-0 is important to identify. In my opinion, permits need to be issued under 3-6 months. Permits are issued for ecological restoration projects in 3-6 months in other parts of the country, so with more transparency, consistency, and efficient e-permitting dashboards, this is possible.	In addition to riverine systems, Action HW 3-3 also aims to address habitat patches within the coastal boundary. Additionally, the Action HW 1-1 description already has language in the text addressing this comment "Work with partners to streamline permitting processes, promote best management practices region-wide, and enhance communicate with agencies and regulators." The following activities have been added to Action HW 3-3 to reflect these comments: "Support the development of a pathway to streamline permitting for stream and river restoration projects. The River Restoration Network has already developed 11 collaborative pathways for cross-sector work to advance stream barrier removal. More specifically, the Partnership should strive to identify pathways to issue permits within three to six months"; "Support partners to implement more transparency, consistency, and efficient e-permitting dashboards to achieve shorter permitting timelines"; and "Develop guidance (e.g., flow chart) documenting the steps and estimated timeline of the permitting process. This process should include: Identify permitting timelines (collecting more information on how long it takes to write permits, submit permits, review permits, and receive permits); Explore the use of a state and federal programmatic review to cover the priority ecological restoration work identified by the 2025 CCMP."
126	No disagreement with content - CT River Gateway Commission is a potential ally/matching grant source for the 8 towns and lands within the Lower CT River Gateway Conservation Zone.	Thank you for your comments. Please allow us to add some of your staff to our various work group email lists so that you may join us when you are available to do so
127	The Atlantic sturgeon (Acipenser oxyrinchus) belongs to an ancient group of primitive fishes confined to the northern hemisphere, whose evolutionary lineage dates back hundreds of millions of years. Sturgeons (Chondrostei) are considered one of the oldest species of bony fishes (Osteichthyes), retaining a cartilaginous skeleton with some degree of ossification. Yet, despite flourishing since the age of dinosaurs, sturgeon as a group are globally imperiled and threatened with extinction, following decades of habitat destruction and overfishing, especially the harvesting of sexually mature female sturgeon for their eggs (caviar) in estuaries like the Hudson. The Hudson River stock of Atlantic sturgeon remains the largest sub-population, officially known as the New York Bight (NYB) Distinct Population Segment (DPS). Yet, despite a quarter-century coastwide ban on commercial fishing for Atlantic sturgeon, and a decade of protections under the Endangered Species Act, the Hudson's population of adult Atlantic sturgeon has failed to recover. Stricter state and federal protections are needed to support their fragile recovery. Atlantic sturgeon are known to move through the East River/Western Narrows and Long Island Sound, and yet too little is known about which habitats they use, and when. As a result, Significant Coastal Fish & Wildlife Habitats, commercial fishing regulations, and other management programs do not sufficiently protect the species in these waters. The draft plan should support the protection of Atlantic sturgeon by launching, expanding and syncing sturgeon monitoring efforts in Long Island Sound, so that data gaps in New York waters are filled in, and that both Connecticut and New York share data for analysis in the waterway. The data should be used to update Significant Coastal Fish and Wildlife Habitat designations, commercial fisheries that result in sturgeon bycatch, and other management programs. These recommendations can be accomplished by updating Objectives 1 and 2 of Goal 2 (Thriving Habitats and Abundant Wildlife) of the CCMP with two measures of success: Gather, share and analyze data on the use of Long Island Sound by Atlantic sturgeon, and sturgeon mortality documented within Long Island Sound. Update Significant Coastal Fish and Wildlife Habitat designations based on the analysis, and ensure data informs other management decisions, including potential gear restrictions or area closures to reduce bycatch mortality.	Under the Thriving Habitat and Abundant Wildlife Goal, there are several objectives and actions that aim to protect wildlife, like Atlantic Sturgeon. For example, the following activities are listed under the Coastal Habitat Objective specific to Species of Greatest Conservation Need (like Atlantic Sturgeon), Action HW 1-1: Prioritize coastal habitat restoration projects activities using the following criteria: Projects that support New York and Connecticut's Species of Greatest Conservation Need and Action HW 1-3: Monitor Species of Greatest Conservation Need that are using these critical habitat types (i.e., before and after monitoring surveys of at-risk bird species, and aquatic animals). Additionally, under the Offshore Habitat Objective, Action HW 2-1 lists the following activities related to the protection of Atlantic Sturgeon: Support benthic studies to help identify areas unsuitable for underwater or buried cable placement; Support pelagic and demersal population studies that address spatial and seasonal distribution within offshore habitats; Use data collected to inform regulatory decision-making for the protection of offshore habitats, including forage species and other wildlife, and nonnative species management. The performance measures are made to be broad and inclusive, rather than listing specific species.
128	As we face the climate and biodiversity crisis and feel it's impacts locally, the focus on thriving habitats is essential - abundant wildlife will follow. We appreciate the focus on connectivity. Many of our watershed and conservation groups here in Connecticut participate in culvert surveys. While the surveys are often carried out by volunteers, it is up to staff to do quality control and data entry. This data could be essential to help meet these goals so, hopefully, resources can be offered to these groups so they can carry on the surveys and continue to submit data. This will also be essential for community resilience as these surveys often identify flood hazards and can be used to prioritize replacement and right-sizing.	The following activity has been added to Action HW-3-2, "Support dissemination of trainings and resources to build capacity in assessments and monitoring."
129	Focus a little more on native species requirements as part of restoration work. ; Ecosystem services are mentioned in the introduction to this goal but a stronger connection to restored and protected habitat and open space to natural resilience from flooding and climate issues could be made in the objectives/actions. ; Make sure language is included to cover waterfront access especially considering healthy waterways for recreational activities along LI north shore, focusing on activated partnerships between local and regional groups, can develop a "living" stakeholders list and/or forum for engaging communities. Tied to the action "Increase equitable access and enhance sustainable stewardship of conserved lands particularly for underserved communities and/or Environmental Justice communities."	The following activity has been added to HW 1-1: "Prioritize coastal habitat restoration projects activities using the following criteria: Projects that seek to reduce the impact of non-native invasive species (e.g., plant native species and remove non-native invasive species)." The following sentences has been added to Objective HW 1, Coastal Habitat, technical explanation to emphasize the importance of ecosystems services: "Furthermore, by restoring and protecting coastal habitat, this objective and its actions, aims to preserve the longevity of the ecosystem services provided by coastal habitats. These services include, but are not limited to, providing habitat and food sources for wildlife and their juveniles, storing and cycling nutrients, protecting the shoreline from erosion, and serving as wildlife biodiversity hotspots." Additionally, Goal 3, Sustainable and Resilient Communities, goes into more detail about coastal resiliency. Under Goal 4, Informed and Engaged Public, Objective IEP 1, Public Access and Sense of Belonging, focuses on increasing opportunities for everyone to access and appreciate the Long Island Sound and the water that flow into the Sound. Under Objective HW 4, Conserved Open Space, technical explanation, the Partnership acknowledges the connection to Objective IEP 1 and memorializes the need to work complementary. The following activity has been added to Action HW 4-2, "Support the development of new partnerships with communities, who have not typically benefited from projects, to foster increased participation in stewardship and accessibility."
130	The comments above in 8 would help address a significant source of pollutant.	This comment is more appropriated addressed under Goal 1, Clean Waters and Healthy Watersheds. The Thriving Habitat and Abundant Wildlife Goal focuses on the coastal boundary with the intent to restore and protect habitat and wildlife.
131	LISS should be working with the Tribes to do LIS Seafloor mapping. There are LIS areas that are sacred. Can we include fish passage as well? We have the oldest Indian Reservations in the country in our Watershed, and one of them is dependent on a dam which is almost as old as the rez. Shallow wells depend on there being water behind that dam. But they also want to bring Seeqanamâhs (river herring)home.	The Objective 2, Offshore Habitat, was developed to build upon an already existing Initiative: LIS Cable Fund Steering Committee (more info at https://longislandsoundstudy.net/research-monitoring/seafloor-mapping/). The Initiative aims to conduct seafloor mapping characterizing the sedimentary, geological, ecological, and physical properties of the seafloor of Long Island Sound (LIS) and is performed by a consortia of federal and academic researchers based on decisions and guidance provided by the Steering Committee. Thus far, projects have helped improve the available scientific data of the LIS seafloor, providing an improved scientific basis for management and mitigation decisions for LIS. Tribes/Nations is now listed as an agency under Cooperators and Partners for this action. Fish passage is addressed in both Coastal Habitat (restoration of riverine migratory corridors) and Habitat Connectivity (reestablishing, improving, maintaining riverine connections). Tribes/Nations is now listed under Cooperators and Partners for these action.

Goal 3: Sustainable and Resilient Communities

	Public Comment	Formal Response
132	Objective 1 - The part on how to track/reach EJ audiences is vague; it is recommended to use a number or percent of people contacted to be from the EJ communities.	Under Objective 1, we are interested in tracking new participants from all communities. Tracking is proposed at the level of partners/communities engaged (rather than counting individuals) in order to best align with our objectives.
133	Objective 1 - The objective statement should include state and county leaders. Also, elected/municipal officials may need different types of outreach other than trainings (e.g., field trips).	The word "municipal" has been changed to "government" in the objective statement to be more inclusive. We agree that different types of trainings are needed for various audiences. The objective description states that trainings are tailored to local needs and offered in various formats and we have added language in the description that clarifies that this includes field trips.
134	Objective 1 - In the Objective statement, add "support to increase a communites' capacity..."	The meaning of the sentence remains the same with or without the addition of this phrase, so we are leaving it out for the sake of brevity.
135	Objective 1 Action 1-1: The word 'assist' is too vague. Use to empower local leaders to implement projects...	The focus of objective 1 is on increasing knowledge of sustainability and resilience issues and solutions rather than project implementation. Therefore, no change will be made as Objective 3 focuses on implementation of projects.
136	Objective 1 - There were complaints about the usage of and/or. This is more acceptable in technical usage and not fit for public usage.	All instances of and/or were changed to use one or the other based on context.
137	Objective 1 Action 1-2: Action 2 seems like two different actions. It should be broken into two.	After considering breaking up this Action into two, the action as been reworded to incorporate the ideas together better.

138	Objective 1: EPA should review the whole document for consistency where monitoring and climate change are mentioned. *PRAE Act requires climate change to be considered for every Objective.	The PRAE Act requires CCMPs to address "the effects of recurring weather events on the estuary, including the identification and assessment of vulnerabilities in the estuary and the development and implementation of adaptaiton strategies." The CCMP meets the requirements of the PRAE Act through the descriptions under the Goal sections, Appendix B, Appendix D, and the publicly available LIS vulnerability assessment.
139	Objective 2 - Actions could be more measurable e.g., how many resiilence plans developed? How do you coordinate across municipal boundaries - meetings, conferences, shared plans?	The measure of success for this objective is that all 135 municipalities within the LIS coastal boundary identify key resilience priorities. Number of plans and progress toward this objective will be tracked. See the description and technical explanation for Action 2-2 for details on how coordination will be achieved in Appendix B.
140	Objective 2 - Recommend not using empower - LISS isn't authorized to empower anyone, it seems intended to be inspiring but could be construed as patronizing. Suggest focusing on engagement and being more specific about the how.	The Partnership discussed at length the wording of the objective and landed on empower. The program receieved other public feedback that people liked the word empower. Specifics about the how are provided in the description and technical explanation for Action 2-3 in Appendix B.
141	Suggested rewrite of Objective 2 Action 2-3: Engage community members and groups, including historically underserved and overburdened communiites, and increase capacity for local and regional resilience planning and decision-making through trainings, conferences and resource sharing.	This action is intended to be about expanding participation in local and regional decision-making and planning to ensure all views and needs are considered. Objective 1 focuses on trainings and resource sharing.
142	Objective 2 - Quantify the number of communities engaged per year.	Performance measures for action 2-3 include tracking the following on an annual basis 1) Number of new partners/community groups engaged in resilience planning/decision-making . 2) Number of new distressed communities engaged in resilience planning/decision-making. See more details in the technical explanations in Appendix B.
143	Describe how many of the 135 towns have resilience plans and how many additional needed to get to "all 135".	This information can be found in the Objective 2 description and in the technical explanation in Appendix B.
144	Suggested rewrite of Objective 3: Implement 200 community initiatives to improve resilience to flooding, climate impacts, and other environmetnal challenges.	For consistency, objectives within the plan have been formatted to include a qualitative statement along with a separate measure of success that includes the quantitative information.
145	Objective 3 - Strive for a single objective statement that includes metrics.	For consistency, objectives within the plan have been formatted to include a qualitative statement along with a separate measure of success that includes the quantitative information.
146	Objective 3 - Add climate impacts to objective.	This Objective is meant to be broad enough to include all environmental impacts as well as impacts from extreme weather events. The detailed objective technical explanation in Appendix B includes more specific description. Also note that the PRAE Act additions to each action addresses how the action will serve as an adaptation strategy for vulnerabilities.
147	Objective 3 - Nature based solutions should be part of all actions - consider rewriting into objective.	The Partnership agrees with prioritizing nature-based solutions wherever possible, as outlined in the description of Action 3-3. Under this Objective, it is critical to leave room for other impactful resilience solutions (such as right-sizing culverts, or other activities fitting the description under Action 3-4). Objective 3 includes non-tangible resilience initiatives such as capacity support programs, the adoption of updated regulations, and the adaptive management of resilience projects.
148	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.	For this Objective, the Partnership is most interested in assessing our reach and the types of trainings offered, rather than tracking hours on an individual level as the program thinks it is more impactful. The Partnership includes a measure that tracks the number of unique trainings.
149	Goal 3: Sustainable and Resilient Communities Empower Long Island Sound communities to plan for and respond to environmental challenges in ways that prioritize well-being for all Save the Sound is encouraged by the time and expertise that went into Goal 3 to consider the most efficient ways to increase Long Island Sound communities' resilience to the environmental issues we face together of "a changing climate, including flooding caused by heavier rainfall, more intense storms, and rising sea levels." (pg. 13) For "Objective 1: Informed Decision-Makers," we recommend reviewing the references to who is included in the term "decision-makers," as currently there are some inconsistencies. In the Objective Statement it refers to "municipal, nonprofit, and community leaders," but in the SMARTIE structure the Measurement expands that definition to include tribal leaders, consultants, and engineering firms, who are not municipal, nonprofit, or community leaders. Consistency and clarity of the actors involved will help us better organize in an inclusive way to achieve the goal of sustainable and resilient communities. Similarly, in the Action Description and Technical Explanation for Action 1.1, it refers to "policy makers, environmental professionals, and community decision-makers." Our recommendation is to define decision-makers as "government, nonprofit, and community leaders" to include tribal leaders but exclude consultants and engineers. Then, for "Objective 2:Community-Driven Resilience Planning" in Action 2-2, we suggest adding Councils of Government (CT) and County Governments (NY) as Cooperators and Partners here and referencing them in the action description as potential catalysts for collaboration across political boundaries. In the SMARTIE Structure Measurable section for "Objective 3: Resilience Initiative Implementation," it says, "initiatives completed using LISS support/funding or in coordination/partnership with LISS partners." It would be helpful to clarify here, and in the Source column, who is included in the category of "LISS Partners" since initiatives must be completed in coordination or partnership with them (or with LISS funding) to be counted. Next, please see Action 3-1, where it says, "Activities to enhance community capacity to implement, manage, and sustain initiatives could include continuation of existing financial and technical assistance programs… between municipalities and nonprofits and other experts." Community groups may have been intended to be included in "other experts" at the end of this statement, but that is not clear. Please consider explicitly naming community groups or leaders as a target of capacity support and partnership development under this action, for clarity and to ensure our shared goal of inclusion.	Thank you for the many good suggestions to help the language be more consistent. The Partnership decided to use "decision-makers" as the most general-level term and to define it as "government, practitioner, and community leaders" to encompass all of the intended target audiences. Consultants and engineers are included under the term "practitioner," which would also include nonprofits, because they often influence and advise those in leadership positions. The term "government" has been added instead of "municipal" to be inclusive of state, local, and tribal governing bodies. Regarding clarifying "LISS Partners" - the CCMP now includes a description to specify that this includes "anyone receiving Partnership funding or participating in work groups or committees."
150	This is clear, but needs to focus on provision of infrastructure to sustain increased populations to protect our waters from pollution.	Please refer to Goal 1 which focuses on reducing pollution and promoting clean waters.
151	I am unsure whether this goal includes resilience work in the rest of the LIS watershed. New Hampshire and Vermont have been heavily impacted by flooding in recent years, resulting in addition of a huge amount of pollution to the Connecticut River watershed. Improving resilience will both help upper watershed communities and lower watershed communities. There are many projects that could be undertaken in the upper watershed (e.g. wetland/stream restoration, infrastructure improvement) that would improve downstream flooding through flood water attenuation and reduced pollutants.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
152	There are innovative flood barriers on the market that are designed to mitigate the potentially catastrophic effect of floods & subequent erosion. They are being used in Florida this season & the Aquafence protected Tampa Bay Hospital. Many of these hi-tech mitigation devices are designed in Scandinavia, hint. When it comes to designing bridges, flood control, sustainability the best examples come from across the pond. We don't think out of the box here in our country; it's become more about agendas & control.	The Long Island Sound Partnership is focused on prioritizing nature-based solutions (whenever possible) that provide multiple benefits to addres flooding and otherextreme weather impacts. Program partners remain interested in learning about new innovative solutions.
153	I am unsure whether this goal includes resilience work in the rest of the LIS watershed. New Hampshire and Vermont have been heavily impacted by flooding in recent years, resulting in addition of a huge amount of pollution to the Connecticut River watershed. Improving resilience will both help upper watershed communities and lower watershed communities. There are many projects that could be undertaken in the upper watershed (e.g. wetland/stream restoration, infrastructure improvement) that would improve downstream flooding through flood water attenuation and reduced pollutants.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
154	The informed decision maker training goal needs to be 200 - just to support 133 communities with turn over of personnel	The goal is to reach 100 ***new*** participants each year over the next 10 years, which should help account for staff turnover.
155	Yes, clear goals. Missing: even minor steps by property owners can benefit resiliency and should be encouraged by zoning regulations: native riparian buffers, reduce turf lawns and herbicide/pesticide use close to streams, rivers, shoreline. Restrict herbicide applications from 4-step treatments to what Niantic River Watershed behavior change study (LISS Funded) promotes: 1 application, only if needed, usually in September. Educate Zoning Commissions on riparian buffers, native vegetation.	Action 3-2 pertains to developing such regulations. The IEP Objective 3 and associated actions also address these topics.
156	This goal should include utilization of other planning efforts to develop resiliency plans. For example, hundreds of thousands of dollars of federal funds go into EPA approved watershed-based plans. Yet, these plans often sit on a shelf and are forgotten when the state or municipalities propose a project - proposals that sometimes go against the recommendations of WBPs. There should be incentive for communities to implement WBP recommendations in their plan and regulation development. That being said, this should not be done to the exclusion of communities that do not have WBPs. It seems that there will be a focus on training planning, engineering and land use officials at the municipal level. This will be essential	The CCMP definition of plans under Action 2-1 is as follows: "Includes standalone climate vulnerability assessment and adaptation plans, standalone sustainability/resilience plans, or resilience priorities that have been identified as a major component of a watershed plan or another municipal, local, or regional plan. Hazard mitigation plans and plans or priorities that are more than 10 years old and are not actively being completed, reviewed, and/or updated do not count toward this tracking." Also refer to the WW Goal.
157	For Objective 2, can you list how many municipalities out of the 135 have already identified key resilience priorities?; In action #3 under Objective 3, in addition to "implement nature-based solutions, it may be helpful to reiterate that protecting and restoring habitat and open space increases community resilience to flooding and climate impacts. ; Incorporate information in strategies to identify available transportation services including the Suffolk County Transportation (SCT) bus service as a form of transportation support, which through Suffolk County Department of Public Works with support from Economic Development and Planning, continually evaluates the service plan and operations for improvements such as route alignment to access destinations and public amenities on the LI north shore. Specific Local Government entities and transit agencies/operators ought to be listed as part of 'Cooperators and Partners' to memorialize these connections and pathways for improvement as a cited top-priority access related issue, transportation barriers preventing equitable access to the Sound (Action SRC 1-1; SRC 3-4).	Please see the description of Objective 2 for details regarding the current number of identified resilience priorities. Under Action 3-3, protection and restoration of coastal habitats is included in the action desciption. Please see the detailed technical explanations Appendix B. The topic of resilience implementation may integrate with transportation. Please see Action SRC 3-4 which pertains to infrastructure. Regarding public access, the IEP Goal more explicitly addresses this priority (see IEP Objective 1).
158	Comment in 9 is pertinent here as well.	SRC Action 3-2 encourages the development and implementation of regulations, codes, and ordinances that enhance community resilience to environmental challenges. Activities to support this include the development and adoption of proposed new or **updated** codes or regulations as well as assisting with programming or technical resources to aid municipalities with reviewing and updating local codes.

159	Add HEAT into the list of Climate Impacts (p13). Consider training trainers and regenerative workforce development, especially pairing with Indigenous knowledge. Not forgetting that communities are full of expertise.. Big problem with the focus on adaptation only. Adaptations that are not also mitigating climate change will not help in the long run.. We really love the Community-driven Resilience Planning. P.98 has a typo: reginal Action 3 needs to emphasize Equity and Youth Workforce Development. LOVE SRC 3-2, regional and bioregional knowledge exchange, especially if it also includes Indigenous knowledge. SRC 3.3 - Action (p104) should include regenerative design and food production in the list of already common solutions	Heat is not specificially listed as a extreme weather event in the PRAE Act. The PRAE act has 7 extreme weather events it identifies: (1) warmer summers; (2) warmer winters; (3) warmer waters; (4) increasing drought; (5) increasing storminess; (6) sea level rise; and (7) ocean acidification. Youth Workforce Development is desireable but too far removed from the focus of Objective 3. "Regenerative design" term is interesting but is too broad. While some nature-based solutions may include food production aspects, food production on its own does not fit as a resilience goal.
	Goal 4: Informed and Engaged Public	
	Public Comment	**Formal Response**
160	Suggested rewrite of Objective 1 Measure of Success - Create at least 40 new sites and improve physical and/or programmatic accessibility to at least 60 existing sites, including at least 30 projects benefitting historically underserved and overburdened communities, around Long Island Sound's shoreline and its connecting waterbodies in Connecticut and New York and show an increase in sense of belonging based on findings from the Long Island Sound Public Perception Survey by 2030.	The recommendation has been incorporated in revising the Measure of Success. Additional context has been added to explain the reasons behind the measures.
161	Suggested rewrite of Objective 1 Action 1-1: Collaborate with local government, environmental groups, and community leaders to develop a new public access plan and initiative to increase, improve, and steward public access sites and sense of belonging.	The comment recommends adding the word "steward" to the action language. "Steward" was not added in this action because there is a separate objective that addesses stewardship. This objective is specifically about connecting people to the Sound and its rivers. Connection is the first step toward stewardship, which is described in Objective 3.
162	Suggested rewrite of Objective 1 Action 1-2: Develop and implement 40 new public access projects, improve quality and accessibility for people with disabilities and families at 60 existing sites, including at least 30 site improvement projects that benefit historically underserved and overburdened communities.	The recommendation has been incorporated in revising the Measure of Success. Additional context has been added to explain the reasons behind the measures. The words "at least" were removed before the numeric targets.
163	Suggested rewrite of Objective 1 Action 1-3: Conduct and support events, festivals, celebrations, materials, and programming that show increased sense of belonging based on findings from the Long Island Sound Public Perception Survey.	The recommendation was not made because the action should not be tied to the public perception survey. Not all of the Partnership's events and celebrations will be in response of the findings from the public perception survey so the language in the action should remain broadly applicable.
164	Objective 1 - Incorporate ongoing stewardship and maintenance of access sites, not just creation and improvement.	More detailed information about ongoing stewardship and maintenance of access of sites is included in the technical explanation of Action 1, which can be found in Appendix B.
165	Objective 1 - Explain why 50% benefitting underserved and overburdened communities.	The measure for increasing access is based on a Long Island Sound needs assessment, which showed that existing coastal access is inadequate in many communities.
166	Objective 1 - Clarify intent: accessibility for the families of people with disabilities or a separate need related to accessibility for families.	Accessibility is not defined by the Partnership as any one single user group. As described in the Appendix B objective technical explanation, the intent is to enhance accessiblitiy for everyone.
167	Objective 1 - Simplify measure of success - consider moving site improvement definitions to actions, hyperlink or technical documents. Strive for a single, measurable objective statement.	The CCMP includes this additional context so that readers can readily understand what is considered a site improvement and the audience for whom the imrpovement should serve.
168	Objective 1 - Suggest adding public perception survey as an action - recommend conducting by 2030.	In objective 1.1, we are addressing the need for continued research into understanding a sense of belonging. The survey is part of the ongiong research.
169	Objective 2 - Include more description or replace "environmental literacy" in objective. It isn't mentioned in the actions or measure of success, is it needed in the objective statement? How does literacy differ from education and engagement? How is literacy measured?	Environmental literacy is defined in the glossary. The term "knowledge" has also been added to help explain what literacy is in the context of this objective.
170	Action 3-1 restates the objective - should be written as an action. Suggested rewrite of Objective 3 Action 3-1: Conduct and support volunteer and community-led monitoring, restoration, and conservation of Long Island Sound and its ecosystems through volunteerism, participatory science, and community-led action.	Action 3-1 begins with "increase opportunities," to emphasize the need to broaden the existing opportunities currently provided across the region through volunteerism, participatory science, and community-led action.
171	Actions 3-3 - 3-5 are direclty linked to objective. Action 3-1 and 3-2 need clarification and connection to the objective.	Action 3-2 has been revised to better connect the objective and the action: "Projects under this action should be designed to be applicable in management efforts, such as to help guide or shape behavior change or stewardship campaigns." Action 3-1 focuses on volunteering, citizen science, and community action, all of which directly link to the objective.
172	Action 3-2 is value - requires more specificity and more connection to bojective. What are you investigating about the relationship? Could this move to IEP Objective 1?	Action 3-2 has been revised to better connect the objective and the action: "Projects under this action should be designed to be applicable in management efforts, such as to help guide or shape behavior change or stewardship campaigns." Action 3-1 focuses on volunteering, citizen science, and community action, all of which directly link to the objective.
173	Objective 3 - Use people instead of "the public"	Public refers to the population as a whole. People has that meaning, but other meanings as well. As a result, no change was made.
174	Actions 3-3 and 3-5, consider changing "encourage residents" to "encourage communities" and explain in the Action template.	Communities are addressed in the action. As a result, no need was made.
175	Objective 3 - NYS 30x30 plan and open space links with IEP and HW objectives. Pathway for funding through bond act.	The plan is addressed in healthy watersheds goal.
176	Objective 3 - Volunteerism should lead to funding and policies.	Volunteerism is specifically mentioned in Action 3-1.
177	Objective 3 - LIS and its watershed or LIS and the watershed?	The language used is LIS and its watershed.
178	Objective 3 - Overall, actions are too long and technical. Consider editing for shorter, punchier actions.	The actions have been editted down without losing context.
179	Objective 3 - Make sure the public knowls how they can participate and are related to their local environment.	Thank you for your comment. The Partnership aims to accomplish this through implementation of the CCMP.
180	Objective 3 - Environmentally friendly doesn't need a hyphen.	The hyphen can also be used.
181	Goal 4: Informed and Engaged Public Inspire and empower the public to appreciate, value, and protect Long Island Sound and the waters that flow into the Sound. Save the Sound recognizes the importance of an engaged public in supporting the work being done to restore, protect, and conserve Long Island Sound. The more connected people feel to Long Island Sound, the more invested they will be in its care. To that end, we appreciate the efforts and initiatives outlined in Goal 4: Informed and Engaged Public. We strongly support "Objective 1: Public Access and Sense of Belonging," which seeks to "create at least 40 new sites and improve at least 60 existing sites around Long Island Sound." While we recognize the stated need to establish "criteria on what constitutes a new site," it might be helpful to outline for the public: • Prospective ways for new sites to be created. • How often new sites are created, and how many have been created in the last 5-10 years. • How much of the Long Island Sound coastline is publicly accessible. The CCMP cites Save the Sound's 2023 Long Island Sound Beach Report in calling out that of the 23 Sound beaches in Westchester County, all but five are privately owned. It could be compelling to note how much of the total coastline is not accessible to the public. If it is not possible to quantify that issue, perhaps an action item could be added to figure out a way to measure and track the percentage of the Sound that is publicly accessible. This can be updated annually to demonstrate how much more of the Sound is open to the public as these new sites are added (or existing sites are expanded). We also appreciate the ambitious goals outlined in "Objective 2: Education and Environmental Literacy," specifically the plan to hire "an assistant outreach coordinator to develop and manage a network of environmental education partners/collaborators." The emphasis on creating educational materials for all stakeholders—regardless of age, ability, and language spoken—is essential. The goal of "promoting opportunities for collaboration to facilitate information and resource sharing" would benefit from establishing and promoting an identifiable brand—whether it is the Long Island Sound Study Estuary Partnership (or Program), the Long Island Sound Restoration Initiative, or the Long Island Sound Restoration Partnership (or Program)—as the premier resource for the creation and distribution of such educational materials. Access to these materials and resources would be made easier if there was a one-stop shopping opportunity and a credible, reputable name associated with it. The Public Perception Survey could be issued by that brand and could serve as an educational opportunity in itself. Finally, we are aligned with the premise of "Objective 3: Fostering Stewardship and Sustainable Behaviors," which recognizes the essential role that individuals and communities play in caring for Long Island Sound. While one of the action items calls for "identifying or studying the best methods for community co-development or involvement in planning," we suggest including an action item seeking to understand where the greatest gap is between our environmental needs and our public participation. The more clearly we understand where those gaps are, the more effective we can be in mobilizing and deploying a growing network of community stewards.	The Partnership agrees that understanding gaps in public access on Long Island Sound is critical. As part of the planning process for increasing public access, the Partnership will consider contract support to identify the percentage of Long Island Sound that is publicly accessible and, subsequently, develop a way to measure the change over time. The details concerning prospective site creation and its frequency will be developed under Action IEP 1-1. It is important this criteria is developed with partners. Furthermore, IEP-2 focuses on increasing resources, educational content, and materials through the Long Island Sound Partnership that will broaden the availability of information to the public. Additionally, in response to the comment about of knowledge of environmental needs and public information, in action 3-2 we have added language that seeks to understand where the greatest gap is between environmental needs and public participation.
182	Important to make sure the public is aware when "their" beach is closed because of pollution. Perhaps then they will support initiatives to improve sewage treatment, means to prevent runoff during heavy rains, and so on.	Thank you for your comment.
183	A lack of attention to public information and awareness, which is not the same as environmental education. PI would be a more useful driver for our CAC and other NGOs involved to shift public opinion.	The Action Description and Action 2-3 have been revised to respond to this comment. The term "knowledge" has also been added to help explain what literacy is in the context of this objective.
184	I am unsure whether this goal includes work in the upper watershed. Educating the public in the upper reaches of the watershed could have many positive downstream effects.	The goal includes the upper watershed, and there are opportunities to support this work through our grant programs. Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
185	I wish there were more public sessions. Just heard about this and missed the two sessions.	Sorry you missed the sessions. Please stay in touch with ongoing Long Island Sound activities through our social media and/or newsletter Sound Matters. You can subscribe at the bottom of our homepage: https://longislandsoundstudy.net/

186	I am unsure whether this goal includes work in the upper watershed. Educating the public in the upper reaches of the watershed could have many positive downstream effects.	The goal includes the upper watershed, and there are opportunities to support this work through our grant programs. Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
187	Objective 1 sounds "good", but is it really addressing the goal? What is the definition/criteria of a new site?	An important contributor to having an informed and engaged public is increased access to the Sound and more welcoming public access sites. Criteria will be developed under Action IEP 1-1.
188	A stronger statement of inclusion of communities not geographically near the sound should be considered, and include education on personal impacts on non-point pollution, such as use of chemicals, discharge of run-off into wastewater collection systems and surface disturbances should be recognized. Additionally, a study of local IWWC ordinances shows significant inconsistencies, even though all are based on State Regs - greater consistency and a focus on best practices would boost effectiveness.	IEP Action 3.3 has been revised to include "along the coast and watershed" in the Action description.
189	I really like this section. The one thing I think might be missing, is potentially engaging citizens in states beyond NY and CT. I'm not sure that folks in VT, NH, and MA consider themselves part of the LIS Watershed - and yet their actions impact everything downstream. So perhaps there could be greater partnership with orgs and municipalities throughout.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
190	The work under this goal should include education about how forest health is related to water quality, and how managing forests for increased resilience has a direct impact on the health of the watershed. In addition to increasing environmental literacy, this also has a direct effect of helping to connect people in the upper watershed with the sound. Forest landowners and the general public would all benefit from increased access to education about how their actions in the forest impact the entire watershed, beyond their own property or region. It may be that this is already intended to be part of this work, and it was just too much detail to include in the plan. This work could fit into Objective 2 – Education and Environmental Literacy and/or Objective 3 – Fostering Stewardship and Sustainable Behaviors.	The goal includes education of watershed issues which includes forest health.
191	Please don't re-invent wheels here, instead, support expansion of good existing public engagement programs - International Coastal Cleanup (lots of 1-time events, people of all ages/interests can participate or organize a community cleanup) and Unified Water Study (more intensive, summer-long water quality sampling efforts, requires commitment and training), both organized by Save the Sound; CT River Conservancy's annual Source to Sea Clean-up. Other organizations have already developed good tool kits, don't duplicate, but encourage greater use of existing ones.	The IEP action statements highlight the importance of partnerships in carrying out the objectives of this goal.
192	We should also be celebrating what we have. For those of us that have lived in other states where resources were limited as well as access, we appreciate the fact that within anywhere in the state, one can go to a public space on a lake, pond or stream within a small radius. Of course there can be improvements but, gosh, we're so lucky to have so many wonderful and beautiful lakes, ponds, streams, rivers, estuaries and shoreline here in Connecticut!	IEP Objective 1 action descriptions include celebrations and festivals of the Sound and its watershed.
193	For Objective 1, Action #1, include improved public transportation to parks, preserves, and beaches, as we discussed when we met. ; Incorporate information in strategies to identify available transportation services including the Suffolk County Transportation (SCT) bus service as a form of transportation support, which through Suffolk County Department of Public Works with support from Economic Development and Planning, continually evaluates the service plan and operations for improvements such as route alignment to access destinations and public amenities on the LI north shore. Specific Local Government entities and transit agencies/operators ought to be listed as part of 'Cooperators and Partners' to memorialize these connections and pathways for improvement as a cited top-priority access related issue, transportation barriers preventing equitable access to the Sound (Objective IEP-1 Public Access and Sense of Belonging).	Transportation is included in the programmatic improvements mentioned in IEP-1. Several of the action descriptions of IEP-1 explicitly state transportation improvements. Transit agencies have been added to the list of partners in the technical explanation of actions in Appendix B. The remainder of the Cooperators and Partners list is intentionally broad at this time; specific local municipalities will be identified as work under this objective commences.
194	good.	Thank you for your comment.
195	Access: the coastal tribes have almost completely been cut off from the water. Unlike in MA, RI and many western states, CT still charges for fishing and hunting licenses. Tribal access to coastal and estuarine waters is a key environmental justice question. Will this goal also lead to funding for land acquisition?? Funding community learning and engagement with the Sound over 10 years is going to be way more than 100K-1 million in these categories. We have so far to go!!	The final Comprehensive Conservation and Management Plan has been updated to be consistent with all Administration policies and Presidential Actions. As a result, the plan reflects a commitment to address pollution and environmental degradation of Long Island Sound in all communities based on their severity and impact. References to environmental justice or to diversity, equity, and inclusion as values guiding plan implementation have been eliminated. Commitments to partner with all levels of government, the private sector, and the public remain essential to the plan's values, objectives, and actions. Individual states develop policies on fishing and hunting licenses to conserve and manage wildlife populations. Under Thriving Habitats and Abundant Wildlife Goal, Objective THAW 4, Conserved Open Space, includes two actions where Tribes and Nations can be supported in acquiring land as well as enhancing access and stewardship of those lands: Action THAW 4-1: Protect high-priority coastal habitat from development through implementation of land conservation plans that identify priorities for conservation, management, and investment; Action THAW 4-2: Increase access and enhance sustainable stewardship of conserved lands particularly for distressed communities. Tribes and Nations can be supported in improving public access sites and sense of belonging under the actions of the Informed and Engaged Public Goal, Objective IEP 1, Public Access and Sense of Belonging. Federally- and State-recognized Tribes have the opportunity to work with the States of NY and CT to negotiate land acquisition opportunities using Long Island Sound Partnership funds. Direct support to Federally recognized Tribes involves additional discussion and mutual agreement between the sovereign government and the Partnership. Increasing access to conserved lands is part of Action THAW 4-2 and IEP 1-1 and 1-2. Funding amounts have been revisited and revised accordingly.

Monitoring

	Public Comment	Formal Response
196	Monitoring should be central to the goals of LISS. Particularly pathogens.	Monitoring is central to the goals of the Partnership, including pathogens. Within Appendix B technical explanations, the monitoring plan and needs for each CCMP objective is described in more detail.
197	Do not let monitoring become an obstacle to project implementation. Previously, overly rigorous Nitrogen reduction documentation has been an obstacle to completing valuable projects in the Upper Connecticut watershed. Monitoring within the watershed is also important to determine the effects of different subwatersheds on LIS.	The Partnership acknowledges the need for both monitoring and project implementation. The program aims to use the data and information from monitoring to document progress and trends and to inform decision-making and project implementation. Multiple program partners contribute monitoring efforts.
198	Do not let monitoring become an obstacle to project implementation. Previously, overly rigorous Nitrogen reduction documentation has been an obstacle to completing valuable projects in the Upper Connecticut watershed. Monitoring within the watershed is also important to determine the effects of different subwatersheds on LIS.	The Partnership acknowledges the need for both monitoring and project implemenation. The program aims to use the data and information from monitoring to not only document progress and trends but also to inform decision-making and project implementation. The Partnership relies on program partners to lead monitoring efforts.
199	See my comments about Goal 1.	The comments have been addressed under the Clean Waters and Healthy Watersheds Goal.
200	It may be helpful to include upstream data as well. For example, CRC organizes e.coli monitoring throughout the Connecticut River watershed. Data like that could easily be shared more broadly.	The Partnership considers multiple sources of monitoring data and modeling assessments throughout the watershed to provide insight into program objectives and actions.
201	Resources for monitoring of inland waters in Connecticut is lacking. Massachusetts offers approximately 200K a year to local groups and munis that have continuous monitoring programs. CT DEEP's ambient monitoring program has been significantly reduced over the past few decades. This is apparent in each Water Quality Report to the EPA in the number of waterways that were not assessed or had insufficient data. Organizations struggle to find funding for ongoing monitoring efforts as many funders prefer to fund new programs and funding for staff time for monitoring is even more difficult. In order to have more reliable data in Connecticut, we need funding for local groups for monitoring efforts.	As stated in other responses to comments, monitoring Long Island Sound and streams and rivers draining to it is central to efforts to understanding and improving water quality conditions. The Partnership provides assistance to multiple monitoring programs to collect, manage, and synthesize data. One example is the Unified Water Study that coordinates multiple local groups to monitoring conditions in embayments. Recognizing that funding is finite, the Partnership strives to maximize the utility of monitoring to diagnose problems and formulate effective solutions.
202	nclude a component to the monitoring strategy that addresses gauging the success/effectiveness of methods utilized in project implementation and lessons learned so that future similar projects can be replicated or improved upon.	The monitoring plan section explicitly highlights programmatic and project monitoring to track and record information on implementation of CCMP actions supporting plan objectives. This will include evaluation of multiple metrics—dollars spent, pounds of pollution reduced, acres of habitat restored or protected, and number of people engaged for example. These metrics will quantify Partnership efforts contributing to the achievement of plan objectives. Each project supported must identify metrics of performance to allow for evaluation of the projects success. Technical work groups often review the results of individual project, including site visits to assess the success and effectiveness of project implementation methods. The Partnership will use assessments in meeting objectives and implementing actions to regularly report on progress and redirect actions as a result of the information gained.

Funding

	Public Comment	Formal Response
203	Critically important. Hire a lobbyist.	Clean Water Act Sections 320 and 119 do not authorize the program to use federal funds to hire a lobbyist.

204	Although a degree of prioritization is required, there are a large number of project types with well-documented and cost-efficient benefits (e.g. wetland/stream restoration, tree planting, agricultural pollution prevention). Funding for these projects should be prioritized, with prioritization work focused on the high-cost project types. In my experience as a project implementer, for many of the smaller projects the projects that get completed are determined by landowner and community buy-in much more than the relative efficiency of any given project.	Thank you for your comment. The Partnership recognizes that landowner and community buy-in are important considerations in assessing project viability and success. These are important factors used in considering projects for funding.
205	Although a degree of prioritization is required, there are a large number of project types with well-documented and cost-efficient benefits (e.g. wetland/stream restoration, tree planting, agricultural pollution prevention). Funding for these projects should be prioritized, with prioritization work focused on the high-cost project types. In my experience as a project implementer, for many of the smaller projects the projects that get completed are determined by landowner and community buy-in much more than the relative efficiency of any given project.	Thank you for your comment. The Partnership recognizes that landowner and community buy-in are important considerations in assessing project viability and success. These are important factors used in considering projects for funding.
206	Is there a "Friends of the LISS" that the public can donate to that supports filling the gaps of government funding?	As a federally funded program, the Partnership is prohibited from fundraising. Individuals interested in supplementing government funding can look into ways of supporting non-governmental entities working to protect and restore Long Island Sound.
207	If I wanted to monetarily contribute to an individual project like the dam removal project in the Bronx Zoo, could there be a go fund me link to make it easier. WNYC makes it pretty easy to fund raise. Maybe something similar in advertising?	Individuals interested in contributing to select projects are encouraged to coordinate with the non-governmental partners working on the project to explore additional funding mechanisms on a case-by-case basis.
208	We are glad to see an acknowledgement of the need for more resources to meet the significant demands of the Long Island Sound and its communities. LISS might consider creating a formal or informal rubric to guide the decision-making process around accepting corporate funding to leverage programs like the Futures Fund. Not every corporation shares the same mission, values, or ethical considerations of the LISS or is constituents. It may be beneficial to seek to better align ethical expectations for corporate funders with the end goals of the CCMP.	The Partnership will continue to work closely with federal and state agencies, foundations, non-profits, universities as well as regional and local partners to coordinate efforts, support decisionmaking, leverage resources to implement the CCMP. As stated in the Finance section of the plan, coordination of all stakeholders is key to the efficient use of available resources to attain desired results. Federal, state, regional, local, and non-governmental contributions are critical to the success of the Partnership. As an EPA-directed program, the Partnership is prohibited from engaging in lobbying, private fundraising, or seeking funding directly from private endowments.
209	I have incorporated resource needs comments on the objectives and actions for goals. These should be considered for the funding strategy.	Thank you for your comments.
210	Establish regular meetings and/or workgroups involving local, regional, and state partners particularly funding entities for funding related connection, grantors and grantees, to identify overlapping funding programs that can target areas of the CCMP with natural relationships to also improve public infrastructure for wastewater treatment, transportation, greenhouse gas reductions/renewable energy sources, etc. to incorporate in the LISS resource hub particularly to support with often local match requirements to unlock federal funding and aid programs.	The Partnership will continue to work closely with federal and state agencies, foundations, non-profits, universities as well as regional and local partners to coordinate efforts, support decisionmaking, leverage resources to implement the CCMP. As stated in the Finance section of the plan, coordination of all stakeholders is key to the efficient use of available resources to attain desired results. Federal, state, regional, local, and non-governmental contributions are critical to the success of the Partnership. Congress, through provisions in the Clean Water Act, has charged EPA with providing overall coordination of, and support for, the regional effort. As an EPA-directed program, the Partnership is prohibited from engaging in lobbying, private fundraising, or seeking funding directly from private endowments.

Other Comments

	Public Comment	Formal Response
211	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".	There are multiple studies of the ecosystem services and values that the Long Island Sound and its watershed support. These values have been cited in previous versions of the CCMP. For example, the 1994 CCMP cited a study commissioned by the program that estimate that $5 billion is generated annually in the regional economy from boating, commercial and recreational sport fishing, swimming, and beachgoing. Adjusted for inflation, this estimate now would be closer to $10 billion annually. The 2015 CCMP cited a study commissioned by the program that estimated the financial value of goods and services provided to the region's economy by the natural ecosystems in Long Island Sound and on the lands whose waters drain to ranged between $17 billion and $37 billion annually (Kocian et al. 2014). Treated as a capital asset with a lifespan of 100 years, the value of these natural systems is $690 billion to $1.3 trillion. In addition, an estimated 191,000 direct and indirect jobs in the region result from the healthy function of these natural systems, and associated stewardship work. For conciseness, the 2025 CCMP does not contain information on ecosystem service values. However, the Informed and Engagement Public goal action 3-2 "Investigate the relationship between the public and the Long Island Sound ecosystem through social science research" encompasses further economic valuation studies critical to building public understanding and support.
212	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.	The CCMP actions are written with a focus to address the impacts of extreme weather events in relation to the goals of the plan. More information can be found in Appendices B and D.
213	Enormous project. Overall, excellent. I would focus more on action rather than studies. That's why I suggested Long Island Sound preservation and Restoration Program. Good luck and thanks. -Steve	The Partnership recognizes that studies are in service of taking action and coordinated implementation of the CCMP.
214	Ensure restoration actions can be funded throughout the watershed. Watersheds are inherently interconnected, and what happens in the headwaters can have a huge impact on LIS.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
215	Titus Mill Pond, New Rochelle- Dumping ground for garbage. It is the only State owned Tidal wetland. There has been no maintenance.Titus Mill Pond & New York State Tidal Wetlands is located at the northeastern end of New Rochelle Harbor in the city of New Rochelle in Westchester, New York. The waters in the harbor and pond flow from Long Island Sound. with tides up to eight feet in the inlet and with no fresh water stream entering into it.	The Partnership can investigate adding Titus Mill Pond to the LIS stewardship areas. The Partnership has also funded a project through NYSDEC in 2023 that is working towards restoring Titus Mill Pond as well as conducting site surveys and ecological assessments that is getting underway.
216	I did not see any reference to regulatory engagement. By this I mean engaging with the relevant regulatory bodies that have jurisdiction over restoration efforts. The regulations are difficult to navigate and thwart many grass root efforts that could build c	Refer to Appendix B for in depth descriptions of each action. Information about cooperators and partners to implement actions are listed in Appendix B, which includes information about working with relevant regulatory bodies such as federal, state, and local agencies.
217	1) Address eutrophication upstream with actual physical practices on agricultural fields. 2) Highly advise the state to purchase the Interceptor Vessel. This vessel vacuums up floating debris & can vacuum green scum. It can be used in harbors, across the coast, rivers, & ponds. Instead of picking on people to lose their cars & stoves, use a technology that works. Just look up the diminishing Pacific Plastic Patch, thanks to this Dutch kid.	1) Upstream eutrophication can be addressed through actions under the Goal 1 Nutrients and Watershed Health objectives. One example is Action WW 1-1: Implement nutrient reduction actions across the Long Island Sound watershed with an emphasis on the greatest contributing sources and their impacts on Long Island Sound and its embayments. 2) The Partnership can pursue the purchase of interception technologies through implementation of Action WW 5-2: Promote the advancement and implementation of interception technologies, tools, receptacle bins, and capture devices that remove debris and support education and outreach across the Long Island Sound watershed.
218	Ensure restoration actions can be funded throughout the watershed. Watersheds are inherently interconnected, and what happens in the headwaters can have a huge impact on LIS.	Through this revision of the CCMP, the program's study area has been expanded to the full watershed for actions and activities that affect Long Island Sound. A healthy watershed is vital for a healthy Long Island Sound, though all funding distributed through this program must be directly tied to the restoration and protection of the Sound. Priorities and actions must be consistent with the legislative authority governing the program and will therefore emphasize benefits to Long Island Sound.
219	Great work!	Thank you for your comment.
220	Maybe more if/then graphics. Diagrams of if we do this, then this happens which has an economic value	The Partnership prioritized the use of graphics to convey main points and key takeaways as opposed to complex decision-making trees.
221	In general, the CCMP should explicitly reward projects that create co-benefits with tangible improvements to recreational, water-based access. Boat launches, for example. Recreational access is not explicitly prioritized in the 2015-20 CCMP or apparently in the revision. That is crucial to maintaining public engagement with long term planning for infrastructure projects of the kind that will be necessary to transform the LI Sound waterfront. In the past, we have found a resistance to funding applications that impact more than one CCMP goal/theme. For example, proposals with relevance to both Informed & Engaged Public and Sustainable, Resilient Communities. The most impactful projects will create co-benefits that touch on multiple impact areas. We would like to see this reflected in the revised CCMP and in the proposal vetting rubric. As one of the EPA's coordinating partners in EPA Regions 1-3 for its Thriving Communities Environmental Justice Program, Trust for Public Land is well situated to advise regarding changes to the CCMP and welcomes the opportunity to discuss our suggestions in further detail.	The Informed and Engaged Public goal, specifically under the Public Access objective, supports water-based recreation that is sustainable and helps raise appreciation and a sense of belonging of the resource that is being protected through the CCMP. The Partnership does not define public access uses, such as recreational access, through the CCMP as that decision is left to regional, local, and community partner decisionmakers. The Partnership encourages implementation of projects that create co-benefits and recognizes that projects will impact more than one CCMP goal.
222	Looks awesome!	Thank you for your comment.
223	Investing in the future (intro section) – worthwhile to provide examples of ecological degradation and natural disasters that put stress on people, species, and infrastructure (e.g., recent flood events that overwhelmed riverbanks and destroyed roads). These local examples provide the necessary context to why this plan and this work matter. This lays the foundation for why this work needs to happen quickly. Ecological degradation, climate change, and biodiversity loss are increasing and we need to act quickly to restore these systems so they can support species and support resilience efforts to protect communities and infrastructure.	The CCMP introduction is meant to provide a brief summary of the program, partnership, and purpose of the plan without going into specifics on the individual challenges the CCMP seeks to address. Examples of ecological degradation and natural disasters that provide the context to why this plan and this work matters are provided in Appendix B to demonstrate why the CCMP has focused on the selected objectives and actions.
224	Please see what CT Conservation Districts are doing with their outreach, engagement, education. Look for more ways to partner with them and other organizations that have direct ties and program track records with communities.	The actions under each CCMP Goal highlight the importance of developing and maintaining partnerships to carry out the objectives. The Partnership can look into more ways to partners with CT Conservation Districts and welcomes opportunities for more coordination.
225	Thank you to the management and writing team for all of the hard work that has been put into the rewrite of the CCMP.	Thank you for your comment.

226	Figure numbers referenced in the text are not the same as those listed under the actual figure. ; I noticed that too. On page 3 the figures are labeled 22 and 33 when they should be 2 and 3. ; I like how the document is structured with the goals, objectives, and actions upfront and easy to find and supporting information linked within the text to dive deeper into topics.	Corrections have been made to the figure titles.

Email Comments

	Public Comment	Formal Response
227	Preservation of the New Rochelle islands. Huckleberry, Davids, and Little Pea Island should be turned into wildlife refuges. Conservation easement on huckleberry and little pea and a full on refuge on Davids.	Thank you for your comment. Coastal and island forests are one of the 12 habitat types targeted by the program for restoration and protection. Huckleberry and Davids Island are both designated as Long Island Sound Stewardship Sites, which recognize their exceptional ecological importance to the Sound. Conserving open space is an objective of the plan with a specific measure of conserving 5,000 acres within the coastal boundary. As stated in Action 4-1, the Partnership will work collaboratively to attain the target working with willing landowners, local communities, and multiple levels of government.
228	In the early 1990's A plan was formed called Xanadu to build 55 story towers on Davids Island, including a heliport, 500 boat marina and a bridge from Glen Island Park to the island,longer than the Brooklyn Bridge. A group of concerned citizens formed a coalition to defeat this proposal. It took several years, over 1/2 million dollars for legal fees and studies and in the end the plan was denied by the NY Secretary of State, Gail Shaffer. The island currently belongs to New Rochelle. Inthe intervening years, thanks for help from Congresswomen Nita Lowey, a great deal money was allocated to clean up LISound. Historic buildings were removed from Davids island. I believe it is incumbent upon The LISOUnd Study to make sure this island is not give. to private developers or that nothing be done on the island that would result in added pollution to that part of the Sound. For over 50 years citizens have had to fight off efforts to develop David Island. First. ConEdison wanted to build a power plant, then Xanadu. New Rochelle Historical society has a history of the Island.The future of Davids Island is of prime importance to the western end of the Sound and should be on your radar	Thank you for your comment. Coastal and island forests are one of the 12 habitat types targeted by the program for restoration and protection. Huckleberry and Davids Island are both designated as Long Island Sound Stewardship Sites, which recognize their exceptional ecological importance to the Sound. Conserving open space is an objective of the plan with a specific measure of conserving 5,000 acres within the coastal boundary. As stated in Action 4-1, the Partnership will work collaboratively to attain the target working with willing landowners, local communities, and multiple levels of government.
229	Thank you for the recent Water Quality Monitoring Work Group Meeting. We are in the midst of reviewing the draft CCMP and if we have any comments we will provide them. I just wanted to mention that the Suffolk County Dept. of Health Services has been monitoring the waters surrounding Suffolk County, including Suffolk's north shore harbors (located on the south side of LIS) since 1976. I wanted to point that out because I don't see any mention of it in the LISS Monitoring Project Table. Monitoring-Project-Table-9-18-2024.xlsx (live.com) A link to the SCDHS data that I mentioned can be found by utilizing the link below: https://gis.suffolkcountyny.gov/portal/home/item.html?id=b9ea2548d00f40f0a69f89323d5cc7a4	Thank you for the comment. The Suffolk County water quality monitoring program has been added to the program spreadsheet.
230	CCMP comments - Sentinel Monitoring Network At the fall 2007 managers meeting, Mark Tedesco shared a draft Governors agreement that included the creation of a sentinel monitoring network. In early 2008 UConn Marine Sciences and DEP Coastal Management host a joint meeting of CT experts to discuss such a network and identify some basic goals such as having network components in what was then ELIS, CLIS and WLIS. Following that meeting Todd Fake and I developed the first sentinel monitoring metadata database to track past and present monitoring and potential data that could support monitoring. It was NEVER intended that this would deliver on a silver platter THE NETWORK. I had always envisioned that subcommittees would form focusing on one particular sentinel1. For example: Tidal Wetland Monitoring/Data: 34 permanent photostations at Barn Island (1947), decadal assessment of marsh condition at Barn Island (1953 to the present), 10 microrelief-vegetation transects established in 1973 across CT coast (some have been resurveyed), vegetation maps (important snapshots in time Barn Island (1947, 1976), Great Meadows Stratford 1987, Ragged Rock Creek ~2000, Mamacoke Marsh (1957 to 2020); Accretion rates using sediment elevation tables (Barn Island, Leetes Island, Mamacoke Marsh, Sherwood Island, Great Meadows-Stratford, Gigamoque Creek (Branford); various transects; Barn Island tidal marsh forecast model (far more sophisticated than SLAMM); low marsh losses in WLIS since the late 1800's. Sarah Crosby and USFWS have approved funding to developed a conceptual model of tidal marshes and review and propose a monitoring network. The Northeast Sentinel Monitoring Plan which was largely a volunteer approach had individuals volunteer to be sentinel champions – I for example developed the sections for tidal wetlands and submerged aquatic vegetation. At the moment the sentinel monitoring network for LISS has no components. Circa 2014 or so, I created a preliminary spreadsheet for the Living Resource Sentinels and listing existing monitoring that had been QA/QC's, identified the sentinel issue and suggested that existing monitoring like tide gauges (USGS, NOAA, COE), stream gauges, some elements of the ocean observing network, etc could form the base network and monitoring adding to that as developed. As noted in the attached component of the LISSM plan 2, there needs to be criteria for inclusions, there needs to be a demonstration that the proposed monitoring addressed a listed sentinel and what climate changes questions would be addressed. There would need to be a review committee. (Some of these ideas originated in the Gulf of Maine monitoring network. As I recall the committee selected 10 monitoring activities and agreed to methods of data collection. My recommendation is that there needs to be a small group assigned the tasks of developing the information list below and the begin to identify a network that supports SM. They could start with a few low hanging networks – to formulate the questions, evaluate coverage, identify qualifications to be part of the network. Examples would be tide gauges, the CT River streamflow/salinity network, LIS water quality program to name a few.	Thank you for your recommendation on how to assess and document long term trends in water and habitat conditions driven by past and future conditions. Each action in the plan includes a discussion of the extreme weather events addressed and how the action will serve as part of an adaptation strategy for vulnerabilities. The Partnership will discuss and develop specific activities through its technical work groups and commitees.
231	On a related matter, LISS funded the creation of the LIS Sentinel Monitoring Website – Part 1 is about the LISSM plans and Part 2 is the data clearing house. Juliana Barrett hired me to create the website and while I was still a volunteer at SeaGrant, I would periodically update the broken links. For some reason the recent LISSM chairs have chosen to abandon this site and perhaps create a new website on LISS? I am certain the clearinghouse components have not been duplicated. There are also links to tools some of which analyze data on the fly. Not sure why the pages were not migrated to the new (?) website. The site was hosted by UConn LISICOS – the sentinel monitoring network. Support from the Ocean Observing Systems is ideal for projects like this. At this moment the server is down and Jim O'Donnell is looking for an alternative server. I can share the html files so that they can be viewed locally. I am surprised that the committee that agreed to create the website would abandon the website. I suspected much of the content cannot be found on LISS. I assume that somehow LISSM would find a way to update the website. (The website is based upon two templates – the pages were made to resemble the LIS Resources Center website for that seemed like the natural host but then UConn abandoned support and had planned to migrate it to CLEAR(?). The templates can be changed to match the host website and all of the pages can be automatically updated using Adobe. The question then becomes how to update the website as the state does not use this Adobe software.)	We agree with the need for long-term and stable data clearinghouses to maximize the utility of Long Island Sound data. The LIS Partnership has an agreement with the USGS to develop and refine a LIS data Clearinghouse that can include the meta data that was orginally added to the Sentinel Monitoring Network site. The LIS Partnership believes that this is a superior option for documenting and sharing data and information to scientists, managers, and the public over the long term and is commited to its continued support and refinement.
232	Dear Management Committee Members, On behalf of Save the Sound, I am pleased to offer the following comments on the draft revised Long Island Sound Study Comprehensive Conservation and Management Plan (hereinafter CCMP). Save the Sound is a nonprofit organization representing over 25,000 members, volunteers, and activists throughout the Long Island Sound region. We bring people together to fight climate change, save endangered lands, protect the Sound and its rivers, and work with nature to restore ecosystems. Using legal and scientific expertise we partner with communities to achieve results that benefit our environment for current and future generations. Several members of our staff have provided input to the CCMP by attending various engagement events and serving on the Goal writing teams. We appreciate the opportunity to comment at this stage of the process and offer the following additional observations and recommendations as you work toward finalizing the CCMP. Cross-cutting Observations and Recommendations We commend the collaborative effort that has gone into revising the CCMP and appreciate the extensive coordination that has gone into the planning and execution of the draft. Particularly, we are pleased that the CCMP is expanding its vision to the entire watershed and recommend that the Long Island Sound Study (LISS) office check the U.S. Geological Survey's maps to delineate the areas of the watershed where groundwater contributes to the Sound to more accurately depict the full watershed.	Thank you for your comment and for the work of Save the Sound staff in providing input into the CCMP throughout the revision process. The CCMP will include updated maps, which include the coastal boundary that has been revised by USGS based on the Long Island groundwatershed delineation.

233	We also appreciate the extensive efforts that the LISS took to connect with a broader range of stakeholders who have not yet engaged in this process. We know that you are working to broaden the reach of the LISS through new ways of using social media, and we urge you to continue in that endeavor. We recommend considering paid media (e.g., educational billboards, digital ad campaigns) as a way of further expanding your reach. Finally, we hope that the simplified plan and structure of the CCMP will allow the federal and state stakeholders to strengthen their commitments to developing and implementing policies that will ensure meeting the goals of the CCMP, and to increase funding to the programs that are necessary for that success. Once the CCMP is finalized, we recommend strengthening processes by which these stakeholders can hold each other accountable to deliver on their respective commitments.	The Partnership will take your suggestion of paid media under consideration, particularly through the Informed and Engaged Public Work Group. Within Appendix B Technical Explanations, there is more information on the measures of success and measurables that will be tracked for each CCMP objective. There is detailed information about the implementing partners and the performance metrics that will be tracked for each CCMP action. This detail is included in the appendix as a way to hold the program and stakeholders accountable to deliver on these goals, objectives and actions in the CCMP.
234	On behalf of Riverkeeper, Inc., I respectfully submit the following comments on the Long Island Sound 2025 Draft Comprehensive Conservation & Management Plan ("CCMP"). Riverkeeper is a nearly 60-year-old member-supported non-profit organization that protects and restores the Hudson River from source to sea and safeguards drinking water supplies, through advocacy rooted in community partnerships, science and law. Our comments on the draft CCMP are focused on sewage management improvements in New York City, and on Atlantic sturgeon, an iconic federally endangered species that spawns in the Hudson River and uses Long Island Sound. 1. New York City Sewage Management Based on its Combined Sewage Overflow (CSO) Long Term Control Plans (LTCPs), New York City estimates it discharges 10.8 billion gallons of untreated sewage and polluted stormwater into waters that influence water quality in Long Island Sound: the East River, Harlem River, Bronx River, Westchester Creek, Alley Creek, Flushing Bay, Flushing Creek, and Hutchinson River. Riverkeeper has estimated that volumes are in fact substantially higher. In any case, these discharges represent nearly two-thirds of the total volume of CSO discharges from New York City annually. After LTCPs are implemented, the city estimates it would continue to discharge 9.2 billion gallons of CSO to these waterways, and a portion of the treated wastewater discharge will not be subject to treatment for nutrient removal. The need to further reduce these discharges with meaningful, incremental progress toward New York City's goal of eliminating CSO discharges by 2060 should be reflected in Goal 1, Objectives 1 and 3 of the CCMP. Measures of success essential to meeting these objectives include: -Implement the Renewable Rikers project, which would modernize the treatment of 700 million gallons per day of waste currently processed at Hunts Point, Tallman Island, Bowery Bay and Wards Island treatment facilities, and reduce CSO discharges to the East River/Western Narrows and its tributaries. -Update Water Quality Standards for New York State's saline waters, including the East River/Western Narrows, and its tributaries, to "swimmable" (Class SB or SC), and ensure that Water Quality Variances or Use Attainability Analyses require incremental, meaningful improvements toward New York City's goal of eliminating CSO discharges by 2060. -Add tertiary treatment to remove nitrogen from wastewater effluent at New York City's remaining wastewater treatment facilities. The city's Newtown Creek facility is the largest contributor of nitrogen to the East River, followed by the Wards Island and Bowery Bay facilities.	Action WW 3-1 relating to pathogens highlights the need to evaluate and improve wastewater and stormwater infrastructure, including activities to implement infrastructure improvements and abate combined and sanitary sewer overflows in support of approved long-term control plans and municipal separate stormwater sewer system permits. Specific activities, including the projects mentioned (Renewable Rikers, further tertiary treatment) will be evalutated as part of Action WW 1-1.
235	2. Atlantic Sturgeon. The Atlantic sturgeon (Acipenser oxyrinchus) belongs to an ancient group of primitive fishes confined to the northern hemisphere, whose evolutionary lineage dates back hundreds of millions of years. Sturgeons (Chondrostei) are considered one of the oldest species of bony fishes (Osteichthyes), retaining a cartilaginous skeleton with some degree of ossification. Yet, despite flourishing since the age of dinosaurs, sturgeon as a group are globally imperiled and threatened with extinction, following decades of habitat destruction and overfishing, especially the harvesting of sexually mature female sturgeon for their eggs (caviar) in estuaries like the Hudson. The Hudson River stock of Atlantic sturgeon remains the largest sub population, officially known as the New York Bight (NYB) Distinct Population Segment (DPS). Yet, despite a quarter-century coastwide ban on commercial fishing for Atlantic sturgeon, and a decade of protections under the Endangered Species Act, the Hudson's population of adult Atlantic sturgeon has failed to recover. Stricter state and federal protections are needed to support their fragile recovery. Atlantic sturgeon are known to move through the East River/Western Narrows and Long Island Sound, and yet too little is known about which habitats they use, and when. As a result, Significant Coastal Fish & Wildlife Habitats, commercial fishing regulations, and other management programs do not sufficiently protect the species in these waters. The draft plan should support the protection of Atlantic sturgeon by launching, expanding and syncing sturgeon monitoring efforts in Long Island Sound, so that data gaps in New York waters are filled in, and that both Connecticut and New York share data for analysis in the waterway. The data should be used to update Significant Coastal Fish and Wildlife Habitat designations, commercial fisheries that result in sturgeon bycatch, and other management programs. These recommendations can be accomplished by updating Objectives 1 and 2 of Goal 2 (Thriving Habitats and Abundant Wildlife) of the CCMP with two measures of success: -Gather, share and analyze data on the use of Long Island Sound by Atlantic sturgeon, and sturgeon mortality documented within Long Island Sound. -Update Significant Coastal Fish and Wildlife Habitat designations based on the analysis, and ensure data informs other management decisions, including potential gear restrictions or area closures to reduce bycatch mortality	Under the Habitat Goal, there are several objectives and actions that aim to protect wildlife, like Atlantic Sturgeon. For example, the following activities are listed under the Coastal Habitat Objective specific to Species of Greastest Conservation Need (like Atlantic Stugeon), Action HW 1-1: Utilize criteria for prioritizing coastal habitat restoration: Projects that support New York and Connecticut's Species of Greatest Conservation Need and Action HW 1-3: Monitor Species of Greatest Conservation Need that are using these critical habitat types (i.e., before/after monitoring surveys of at-risk bird species, nekton, etc.). Additionally, under the Offshore Habitat Objective, Action HW 2-1 lists the following activities related to the protection of Atlanitc Sturgeon: Support benthic studies to help identify areas unsuitable for underwater or buried cable placement; Support pelagic and demersal population studies that address spatial and seasonal distribution within offshore habitats; Use data collected to inform regulatory decision-making for the protection of offshore habitats, including forage species and other wildlife, and nonnative species management. The performance measures are made to be broad and inclusive, rather than listing specific species.
236	To the principles and coordinators of Long Island Sound Study, I write to submit my written comments which are attached and to ask that the comments in this email also be made part of the record. In my view the study is completely off track when it funds and forwards Bio-Extraction science & projects. Shellfish Bio-Extraction is a fake science and not an effective way of removing nitrogen, shellfish simply don't have a net removal effect. As for kelp there could be almost no more expensive way to remove nitrogen than to use public money paying people to grow kelp. Hydraulic shellfish dredging is straight up habitat destruction; it releases massive amounts of nitrogen, gratuitously - gratuitous because clams live about 3-inches in the bottom and the dredges jet water 18-inches into the bottom so we are resuspending sediment 15 inches beneath the calms - which involves this otherwise sequestered anoxic sediment and wipes out the ecosystem services provided by intact natural shellfish beds. Proponents will say these areas are normally disturbed by storms;. this is BS, these soft muddy bottom areas are low energy areas not normally deeply disturbed by storms.	Nutrient Bioextraction involves growing and harvesting shellfish and seaweed for the purpose of removing nitrogen and other nutrients from coastal waters, providing environmental and economic benefits. Nutrient bioextraction can complement existing programs (such as using advanced treatment methods to remove nitrogen from wastewater treatment plant sewage discharges into the Sound). It is the only method available to remove nitrogen after it has entered the Sound. Numerous scientific papers support bioextraction as a management approach. The Partnership is committed to evaluating its potential, considering costs and benefits from broader scale implementation. For hydraulic dredging reponse see row 239.
237	Living shorelines projects are being used to harden shorelines which displaces natural intertidal habitat. Natural shellfish beds in uncertified water are de-facto shellfish spawner sanctuaries of the first order and they have been profligately destroyed on both sides of the sound without proper consideration of the consequences to water quality and habitat. The last large hydraulic shellfish dredging operation in NY ended this past September but not until after wiping out spawner beds in the uncertified. Recent research demonstrates that local hard clam populations are genetically discrete and differentiated for other local populations. We cannot replace wild shellfish populations with hatchery stock without impacting the genetic integrity of local populations. There are community dynamics of local clam and oyster population that make intact natural populations far and away more reproductively viable than planted spawner sanctuaries. Further the inshore up estuary location of uncertified shellfish beds make them critical to spawning in outer bays. All the focus on hatchery based solutions ignores the need for broadscale rehabilitation of benthic structure with shell, but the CT approach of letting hydraulic clam dredges harvest clams under the subterfuge that they are gathering shell is a bad joke. Look at the excavation values for hydraulic shellfish dredging from 1991. Let's phase out all inshore hydraulic shellfish dredging in the study area once and for all it has been a huge mistake to allow it at all. Hand harvesting with rakes and tongs is the recognized best practice for harvesting hard clams and oysters.	The Partnership advocates for living shorelines that by definition increase intertidal habitat as an alternative to hardened shorelines. Action HW 1-2 is to "Promote the installation of living shoreline methods for coastal habitat restoration and protection, including the conversion of existing hard-armored shorelines to a more natural condition. Activities under this action aim to enhance communication and collaboration with partners, decision-makers, and the public to encourage broader use of living shorelines."
238	The study needs to evaluate the residual TributylTin (TBT) levels in marina associated sediments. TBT is renowned as the most toxic substance we put into water. The problem is that it is very persistent in anoxic sediment and this stuff basically makes invertebrates sterile. The Army Corps and I blame EPA and the state here also have stuck with bio-assay evaluation of sediment for dredge permits. Bio-assay does not really get at chronic effects and scientists have recommended the establishment of a sediment level test. The Swedish standard now measures TBT levels in tissue of marine invertebrates. The concern of the Army Corps is that they might be forced to impose more stringent restrictions on dredging projects. The alternative choice of the corps has been to bury their heads in the sand and not give a damn about inshore invertebrate reproduction anyway. Considering the very high density of moored boats and marinas in the study area the effects of copper bottom paints and residual TBT on sediment on invertebrate reproduction should be a study priority.	One of the CCMP objectives is to research, monitor, assess, and support mitigation efforts on emerging and legacy toxic contaminants to reduce impacts on water and habitat quality. TBT will be considered in actions taken in support of that objective, including WW 4-1 and 4-2.

239	Goal 1: Clean Waters and Healthy Watersheds This is a worthy goal but EPA has failed to perform its core function of appropriately regulating discharges. Combined Sewer Overflows (CSOs) CSO still dump billions of gallons of raw sewage into the study area annually from the Bronx and Queens shorelines. I say this is a regulatory failure because these CSOs operate with permits from EPA in the form of temporary consent decrees which are really permanent exemptions from the Clean Water Act because the renewal of these consent decrees are merely pro forma at this point. These are discharges that degrade US Waters. They are discharges that cause sewage sludge to build up as mud flats around the estuary overwhelming what should be and once was highly productive habitat for invertebrates and finfish. They are massive releases of eutrophying nutrient not accounted for in the Total Maximum Daily Load (TMDL) limits.	In 1994, the USEPA adopted a CSO Control Policy that established minimum requirements for CSO communities to achieve and set forth goals that would allow for the communities to achieve the goals of the Clean Water Act. Regionally, EPA reviews permits and consent decrees issued by CT DEEP and NYSDEC for CSO mitigation consistent with that policy. Each year, NYSDEC collects and summarizes data received in each municipality's CSO Best Management Practice annual report to produce the statewide report. This report includes overall CSO program implementation status, quantification of LTCPs, CSO Outfalls, and CSO permits. Community-specific data & information for CSO program progress is also included. See https://dec.ny.gov/sites/default/files/2024-11/cso2023annual.pdf. CSO discharges from New York City were included in the 2000 Nitrogen Total Maximum Daily Load and are subject to load reductions. In CT, six municipalities have CSOs. The Clean Water Fund for wastewater projects, administered by CT DEEP, has provided critical support for advancing CSO mitigation projects. In the last 20 years, a total of approximately 1.2 billion dollars have been spent on statewide CSO reduction or elimination projects, of which approximately 470 million dollars consisted of state grants through the Clean Water Fund. Reduction of CSOs to a 1 or 2-yr design storm as well as projects to fully eliminate CSOs statewide will likely take several decades to plan, design, construct, and finance additional CSO projects with additional cumulative costs in the billions. CT DEEP continues to prioritize CSO projects to achieve environmental improvements and meet the state's water quality goals.
240	Goal 2: Thriving Habitats and Abundant Wildlife Again a worthy goal but EPA's failure to enforce the Clean Water Act has degraded tens of thousands of acres of Essential Fish Habitat within the study area. EPA is the primary agency responsible for regulating Clean Water Act Discharges and as such has an oversight responsibility to ensure discharges permitted by the Army Corps and the states are clean water act compliant particularly with regard to water quality. In this regard EPA has failed to prevent CWA Discharges associated with shellfish harvesting by hydraulic shellfish dredges which have the effect of degrading US Waters in New York and Connecticut. Hydraulic shellfish dredges work by forcefully jetting water into the seabed creating a slurry of sediment and water which is simultaneously sidecast from the dredge and the dredge trench. It cannot be disputed that the large volume of sediment excavated and sidecast by this water injection dredging process is subject to tidal transport.	New York State law prohibits the use of mechanical harvesting methods, including hydraulic dredges, on public (i.e., state owned underwater lands) and unleased lands for the taking of hard clams and oysters. Municipalities that have management authority and ownership of underwater lands may regulate the manner of harvest for the taking of shellfish, including the use of hydraulic dredges, on town-owned underwater lands. The potential impacts of hydraulic shellfish dredges on benthic habitats, turbidity and resuspension, marine fauna, and water quality may vary based on several factors, which are dependent on the physical and ecological site conditions of the area and frequency of the dredging operation. In Connecticut, the Department of Agriculture, Bureau of Aquaculture (DA/BA) coordinates management and permitting of shellfish beds including Town, State, Natural, and Recreational beds. According to DA/BA, there has been no evidence to support the claim that hydraulic dredges are detrimental to the physical and ecological bottomland conditions. Please refer to the NOAA statement below. NOAA, NEFSC Milford Lab Response to Public Comments on the 2025 Long Island Sound Comprehensive Conservation Management Plan -Eutrophication: Our work in Greenwich, Connecticut, considers nutrients harvested in clams to be removed from the ecosystem, and this work is part of an extensive body of scientific literature by many other researchers in the US and around the world (e.g. Higgins et al. 2011, Petersen et al. 2014, Clements and Comeau 2019). We did not assess surface sediments during our work in Greenwich. It is well established in the scientific literature that natural processes (storms, wind) and human processes (recreational boating) frequently mobilize surface sediments, particularly in the shallow estuarine environment. We consider nutrients associated with surface sediments to be labile and thus participating in natural nutrient cycles including overlying water. -Shellfish aquaculture and nutrient cycling have been discussed at length in peer-reviewed, scientific literature previously (e.g. Rose et al. 2012, Petersen et al. 2012, Carlsson et al. 2012, Humphries et al. 2016, Labrie et al. 2022). The fate of these recycled nutrients can be beneficial in several ways. Nutrients recycled by shellfish can enhance denitrification and net removal of nitrogen from the waterbody. Summertime nutrient recycling can also moderate the "bloom and bust" dynamics with early spring phytoplankton blooms fueling summer hypoxia. Instead, primary production is supported at the time of year when it can be more effectively assimilated by suspension-feeding animals, including shellfish. -State and federal permitting processes are designed to minimize potential adverse impacts of new and existing farms through careful site selection and review of proposed farming practices. Shellfish farms may also provide additional ancillary environmental and community benefits, including habitat provisioning for wild fish (Theuerkauf et al. 2021), wave attenuation (Zhu et al. 2024), larval spillover enhancing restoration efforts (Norrie et al 2020), and cultural services (Michaelis et al. 2021) -Hydraulic Shellfish Dredging: NOAA Fisheries Milford Laboratory researchers conducted a series of studies about 10 years ago that examined hydraulic harvesting activities in the nearshore environment of Connecticut and were unable to detect harvest impacts to benthic communities or sediment chemistry. These papers highlight the dynamic nature of the nearshore estuarine environment, with frequent natural sediment disturbance, and a natural benthic community resilient to disturbance. In 2011, NOAA Fisheries scientists in Milford, Connecticut, published a comprehensive review of the available literature on hydraulic shellfish harvesting, concluding: 1) that variations in oceanographic conditions, seafloor attributes, biological communities and gear types make it difficult to generalize regarding harvesting effects, and 2) that studies needed to be conducted at a variety of spatial scales, with different types of equipment, evaluating a wide range of response variables. Despite an abundance of literature concerning shellfish dredging, there are no definitive one-size-fits-all answers to questions concerning the impact of shellfish harvesting. The Milford Laboratory review document includes an extensive discussion relating to the physical effects of dredging, including suspension of sediment, increased turbidity and sediment plumes, as well as disruption of the sediment surface, changes to sediment composition, creation and persistence of trenches and dredge tracks. We chose these topic areas because this was how the scientific literature generally categorized disturbance to sediments. In our review, we recognized that further research is needed to better understand how differences in the performance and configuration of harvesting gear (volume of water, pressure, intensity of effort) can affect the seafloor. Leaseholders in Connecticut rely on natural recruitment for production of hard clams and must be good stewards of the resource to maintain sustainable harvests. Once the commercial-sized clams are removed from a lease over hours or days, beds lay fallow for 3 to 5 years until the small clams left behind reach market size and natural settlement and recruitment occurs. In many cases, but certainly not all, this intermittent disturbance is similar in frequency and duration to periodic storm events. Harvesting practices, benthic environments and ecological communities vary regionally so care must be used in generalizing about effects. The commenter expressed concern about potential harm caused by sediment mobilization during clam harvest, but this is outside the scope of the research we have conducted and summarized here.
241	The responsible state agencies, NYS Department of Conservation (NYS-DEC) and Connecticut's Department of Energy & Environmental Protection (CT-DEEP) are themselves proponents of continued hydraulic shellfish dredging in LISS's area. In both state hydraulic shellfish dredging has been insulated from appropriate review by separate or sub-regulatory agencies in NY the Bureau of Shellfisheries and in CT The Department of Agriculture/Bureau of Aquaculture permit dredging operation but do not have regulatory responsibility for protecting water quality. This leaves a huge crack in an already complex regulatory scheme where CWA Section 401 Water Quality Certification for federal discharge permits is left to the states. Bureau of Shellfisheries in NY and the Bureau of Aquaculture in CT lack expertise on environmental impacts.	* This comment was addressed in row 239. See Below: NOAA Fisheries Milford Laboratory researchers conducted a series of studies about 10 years ago that examined hydraulic harvesting activities in the nearshore environment of Connecticut and were unable to detect harvest impacts to benthic communities or sediment chemistry. These papers highlight the dynamic nature of the nearshore estuarine environment, with frequent natural sediment disturbance, and a natural benthic community resilient to disturbance. -In 2011, NOAA Fisheries scientists in Milford, Connecticut, published a comprehensive review of the available literature on hydraulic shellfish harvesting, concluding: 1) that variations in oceanographic conditions, seafloor attributes, biological communities and gear types make it difficult to generalize regarding harvesting effects, and 2) that studies needed to be conducted at a variety of spatial scales, with different types of equipment, evaluating a wide range of response variables. Despite an abundance of literature concerning shellfish dredging, there are no definitive one-size-fits-all answers to questions concerning the impact of shellfish harvesting. The Milford Laboratory review document includes an extensive discussion relating to the physical effects of dredging, including suspension of sediment, increased turbidity and sediment plumes, as well as disruption of the sediment surface, changes to sediment composition, creation and persistence of trenches and dredge tracks. We chose these topic areas because this was how the scientific literature generally categorized disturbance to sediments. In our review, we recognized that further research is needed to better understand how differences in the performance and configuration of harvesting gear (volume of water, pressure, intensity of effort) can affect the seafloor. Leaseholders in Connecticut rely on natural recruitment for production of hard clams and must be good stewards of the resource to maintain sustainable harvests. Once the commercial-sized clams are removed from a lease over hours or days, beds lay fallow for 3 to 5 years until the small clams left behind reach market size and natural settlement and recruitment occurs. In many cases, but certainly not all, this intermittent disturbance is similar in frequency and duration to periodic storm events. Harvesting practices, benthic environments and ecological communities vary regionally so care must be used in generalizing about effects. The commenter expressed concern about potential harm caused by sediment mobilization during clam harvest, but this is outside the scope of the research we have conducted and summarized here.

242	On a federal level a similar disconnect exist in within NOAA where the regulatory function regarding work in US Waters authorized by the Army Corps is with NOAA-NMFS Office of Habitat Conservation which provide consultation on permit applications for projects that may impact the Essential Fish Habitat (EFH) of federally managed species. In contrast to the science based consultation which is geared to protect EFH provided by the Office of Habitat Conservation we have NOAA Aquaculture and Ecosystems at Northeast Fisheries Science Center in CT which has no regulatory function but has nonetheless stuffed the box with shit science in support of continued hydraulic shellfish dredging and wild claims that nutrient credit worthy ecosystem services are provided by dredging out natural beds of hard clam from polluted waters (Suzanne B. Bricker, 2018) (Suzanne B. Bricker, 2018) (Anthony Dvarskas, 2020). The fact is that cradle to grave shellfish effectively recycle nutrients to drive new primary production (Higgins, 2013) (Murphy, 2015). The fact that grazing animals across all ecosystems effectively recycle nutrients has not stopped a group of scientists with EPA support from engaging in a propaganda campaign to convince the public that shellfish aquaculture and oyster garden type restoration can play a significant role in fighting coastal eutrophication. The Dvarskas paper goes so far as to claim hydraulic shellfish dredging in polluted water deserves a nitrogen removal credit. Did Dvarskas consider the nutrients release by the deep fluidizing disturbance of shallow mudflats in Greenwich CT. All types of dredging releases nutrients and impact surrounding habitat (Birtwell, 1999) (Dunn, 2017). Are we looking to understand net effects of anthropogenic activities or are we trying to create funding loops for aquaculture and its connected research community.	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243	If you are going around supporting inshore hydraulic dredging as practiced in the study area for transplanting hard clam from closed water you should objectively evaluate the consequences of the broad scale resuspension of fine sediment from these polluted areas which include the burden of bottom paint, hydrocarbons, metals, and nutrients that are bound up in sediment that would remain sequestered if not for these chronic hydraulic clam dredging projects. Non-hydraulic hard clam harvest techniques like rakes, tong, dry dredges, and patent tongs work only in the upper few inches of the seabed which is normally subject to bioturbation. In contrast hydraulic dredge water jets rip deeply into the bottom homogenizing the normal stratified sediment layers. Connecticut hard clam landings are in the toilet but the dredgers are still pushing to access more polluted beds farther up estuary. The overall effect of gutting out spawning beds in closed areas is a broad scale reduction in the chances of recruitment in open areas on both sides of Long Island Sound. Don't believe what I am saying? Do this; a) take a good look at the most recent side scan sonar data for CTs inshore areas and see how extensive the clam dredge tracks are in polluted waters; b) inventory the permits issue for transplants and the recorded boat days and multiply that times 1,400 cubic yards a day; c) then evaluate the type of sediment being disturbed in the inshore waters, it is primarily soft muddy bottom; d) consider the fish species that use these inshore clam beds a spawning and juvenile habitat. The scientist at NMFC Aquaculture and ecosystems have completely misrepresented how and where and on what temporal scale this dredging activity takes place they have literally buried the sediment impact zone implications of these chronic dredging activities to help their industry partners escape regulation. It is amazing that scientists would be so co-opted by industry that they ignore science on the subject like that of Ane Pastor who proved a model based on sediment type and excavation volume to determine the sediment impact zone for mussel dredging in Denmark (Pastor, 2020). Here is a clue – mussel dredges are dry and excavate only a few centimeters while hydraulic shellfish dredges excavate 30-46 centimeters into the seabed (Godcharles, 1971) (MacPHAIL, 1961). Pastor's work demonstrates the obvious; as you add sediment volume the distance to which significant impacts are likely to occur expands. EPA is a partner in this BS. The BS that is that the Army Corps NY District determination that Hydraulic Shellfish Dredging does not cause a regulable discharge on the basis that its impacts are de minimis. Anyone who believes the daily resuspension of 1,400 cubic yard of fine sediment has no more than de minimis effects in the inshore environment should stop lying to themselves and the public. Side scan sonar work in Oyster Bay shows a build up of up to a meter of fine sediment in areas adjacent to hydraulic shellfish dredging. I brought the issue of hydraulic shellfish dredging to Long Island Sound Study in the late 80s and you are still fronting for these dredgers. Every other type dredging project in the study area is seasonally restricted except the one that casts the sediment and smothers the spawning beds with fine sediment through the hard clam spawning period.	The commenter expressed concern about potential harm caused by sediment mobilization during clam harvest, but this is outside the scope of the research we have conducted and summarized here.
244	I am asking that this supplemental document be included with my comment on LISS Draft CCMP. This letter and the subsequent failure of EPA and the Army Corps and NYS DEC to regulate hydraulic shellfish dredging in Oyster Bay demonstrates collective multi agency malfeasance, perhaps more properly nonfeasance. Nonfeasance: ""The omission to perform a required duty or the failure to act when a duty to act existed. Nonfeasance can more loosely be defined as "not doing something which you ought to do." Regulators have been allowing this hydraulic dredging for so long they can't now regulate it without implicating themselves for allowing it and particularly allowing after 2007 when the Army Corps adopted Nationwide Permit #48 Commercial Shellfish Aquaculture with its acreage limits and reporting requirements.	New York State law prohibits the use of mechanical harvesting methods, including hydraulic dredges, on public (i.e., state owned underwater lands) and unleased lands for the taking of hard clams and oysters. Municipalities that have management authority and ownership of underwater lands may regulate the manner of harvest for the taking of shellfish, including the use of hydraulic dredges, on town-owned underwater lands. The potential impacts of hydraulic shellfish dredges on benthic habitats, turbidity and resuspension, marine fauna, and water quality may vary based on several factors, which are dependent on the physical and ecological site conditions of the area and frequency of the dredging operation.
245	Good morning Long Island Sound! Over many years I have searched for information on Tributyltin (TBT) Paint. In 1984 I bought a new clam boat, not just any boat but a welded aluminium skiff from Washington state which was an adaptation of a salmon gillnetter for clamming on Long Island Sound (LIS). TBT antifouling paint was just about the only choice for an aluminium boat at the time as the standard copper bottom paints cause electrolysis to attack aluminium. I mention this because that boat made me a user of TBT paint which at the time was very popular at marinas around LIS and a lot of marinas were painting the big sailboats and power boats with TBT, it was considered the premium job, it lasted longer and was considered faster. There was also a keeping up with Jones element as boaters are always sharing how whatever they did was the best. For myself I definitely got more time in between bottom paintings. Still when sailboats get slimy the owners shorthaul them for power-washing or use dive services to scrub the hull on their moorings which spread this toxin. Being around marinas a lot I am familiar with how operators used to propwash the soft sediment out of the pits under their travel lifts. Australia led the way in the late 1980 by starting to ban TBT because of its effect on oysters. Still in 2018 there were individuals illegally manufacturing and selling TBT paint in New Jersey. Long Island Sound Study should have been on top of this issue because the study area has such a high density of marinas and mooring areas in the bay and harbors around the estuary. I see what can be characterized as a don't ask don't tell policy concerning the legacy of TBT. This compound holds up in anoxic sediment around marinas and mooring fields. One thing that has been largely left undone is to determine the actual levels of TBT in inner harbor sediments to determine hot spots as Norway has done. The choice of studying mussels may have been reasonable but not as an alternative to sediment testing in the obvious areas. The causes for historically low reproductive success of bivalves at a time when harvest pressure is also at an historic low may be related to the past use of TBT and other antifouling paints and their repeated redistributions by sediment disturbances. There is little doubt that the conditions of life for benthic invertebrates have been profoundly degraded in the inner reaches of harbors and bay where we used to get phenomenal hard clam sets. Has this caused decades of clam larvae to be sterile and stunted or nearly so? Isn't that a valid question for LISS? For the foregoing reasons I feel that a TBT Hot Spot survey should be undertaken by LISS. Just take core samples where you would expect to find TBT and its degraded forms.	One of the CCMP objectives is to research, monitor, assess, and support mitigation efforts on emerging and legacy toxic contaminants to reduce impacts on water and habitat quality. TBT will be considered in actions taken in support of that objective, including WW 4-1 and 4-2.