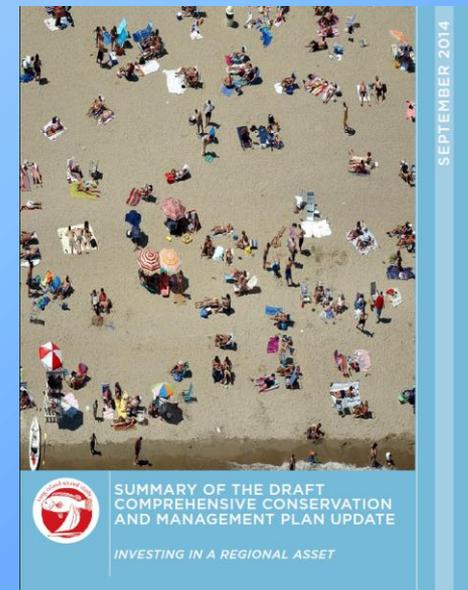
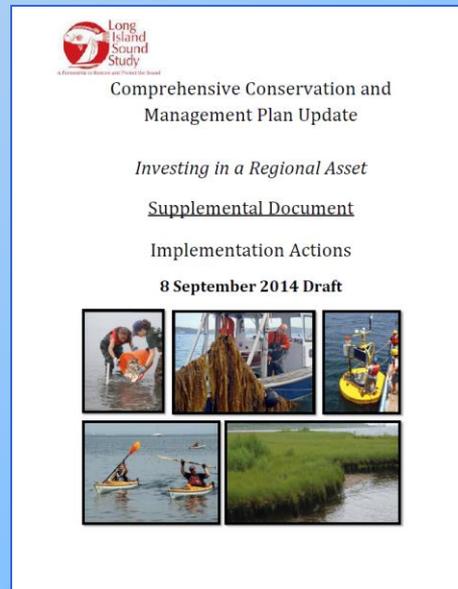
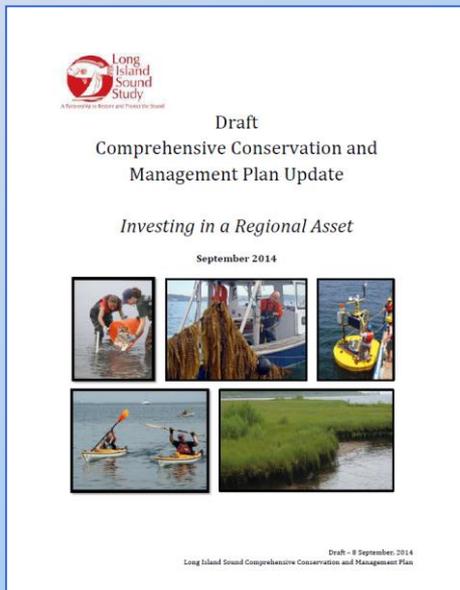


- Public Review Period Open on 09/08/14, closed on 11/08/14
- Two volumes: CCMP and Supplement (Implementation Actions details)
- Summary brochure



Social Media Blitz

- Press releases (CT, NY, EPA), Twitter, Facebook, LinkedIn

Shinnecock Nation consultation

Public meetings

- September 16 Westbury, NY (30 attendees)
- September 16 Bronx, NY (11 attendees)
- September 17, New Haven, CT (45 attendees)
- October 27, Old Saybrook, CT, afternoon (25 attendees)
- October 27, Old Saybrook, CT evening (25 attendees)
- November 6, New Rochelle, NY, afternoon (9 attendees)

Municipal and Public Webinars

- September 10: 60 attendees
- October 28: 20 attendees

250 Public Comments Received by November 8

Line #	Date Received	Name/ Meeting	Affiliation	Comment on Draft CCMP (9/2014)	Final CCMP Resolution
1	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>The updated CCMP must set forth a strong, compelling and inspiring vision for the future of LIS. We must take full advantage of this tremendous opportunity to establish this vision by delineating the threats facing the Sound with urgency, identifying a set of clear and specific priorities for action in both the short- and long-term. The highest priority goals and actions must be featured prominently in the document and in our communications about the effort, and be expressed in easily understandable terms. In this way, the CCMP will provide us with both a firm basis for conservation action and allow us to make the most powerful case possible for continued and increased investment in LIS.</p>	<p>The final CCMP incorporates the vision as originally articulated in the 1994 plan; the final plan contains four broad goals, three underlying principles, and 20 ecosystem targets. Measuring, tracking, and reporting environmental indicators of each target will provide information to help assess progress and increase accountability. In addition to the CCMP, a companion public-friendly CCMP summary emphasizes the key goals and priorities of the plan in plain language.</p>
2	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>The final Summary Document must be redrafted to focus on the specific threats and priority actions of the CCMP in order to make it a more useful tool for inspiring action on and investment in the goals identified. It must provide a succinct blueprint in an easy to read format that will inspire action and investment in the priorities outlined within. In particular, we urge the following overarching revisions:</p> <p>Don't waste precious space on past accomplishments - focus on vision, urgency, and specific priorities for future action that will be the focus of the next 2-5 years of conservation effort.</p> <p>Strengthen and clarify the alignment among and between desired outcomes and targets, challenges, and top actions. This is not always clear in the current document and format.</p> <p>Ensure that challenges track with the top actions, and list the actions in the same order as the related challenges to reinforce this alignment.</p>	<p>The final CCMP incorporates the vision as originally articulated in the 1994 plan; the final plan contains four broad goals, three underlying principles, and 20 ecosystem targets. Measuring, tracking, and reporting environmental indicators of each target will provide information to help assess progress and increase accountability. In addition to the CCMP, a companion public-friendly CCMP summary emphasizes the key goals and priorities of the plan in plain language. More specifically in response to the comments 1) the revised CCMP highlights 12 priority actions in each theme; 2) past accomplishments are limited to an Appendix B; 3) specific challenges and general solutions (detailed in more specific actions) have been added as an introduction to each theme.</p>
3	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>Focus less on process and more on action. Throughout much of the CCMP, there is an over-emphasis on the process to develop tools and data tracking procedures and less on the actions that will be influenced by these tools and procedures. The final CCMP, and especially the Summary Draft, must place a greater emphasis on implementing actions, addressing threats and achieving the goals based on the tools developed.</p>	<p>The final CCMP includes actions across the full spectrum - from building the basic science, developing tools to apply knowledge, to on-the-ground implementation. Implementation actions target agencies, states, municipalities, NGOs, the private sector, and individuals, recognizing the role of each jurisdiction and necessity of each doing its part.</p>

4	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>Revise: New Challenges - Adapting to Climate Change</p> <p>Table refers to "coastal properties worth billions" - rephrase to indicate that these properties are important because they represent billions in local economic value (tax revenue).</p>	<p>The table referenced was removed from the final CCMP. Instead, a challenge to Sustainable and Resilient Communities (Theme 3) now reads "Coastal properties are at risk from rising waters and more intense or frequent storms."</p>
5	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>Revise: What is our vision for the next 20 years?</p> <p>Themes and goals should stand out more on the page and be written to excite the reader, e.g. "Attain water quality objectives" is not as compelling as "attain clean water goals to support the people, communities and living resources of the Sound."</p>	<p>The final CCMP incorporates the vision as originally articulated in the 1994 plan. The theme goals were simplified using plain language. For example, the Clean Waters and Healthy Watersheds goal reads "Improve water quality by reducing contaminant and nutrient loads from the lands and waters impacting Long Island Sound." The Thriving Habitats and Abundant Wildlife goals now reads "Restore and protect the Sound's ecological balance in a healthy, productive, and resilient state to benefit both people and the environment."</p>
6	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>In IAs wherever it lists Audubon or NY Audubon and CT Audubon as a partner or funding source should read "Audubon New York and Audubon Connecticut"</p>	<p>Changed as requested.</p>
7	11/7/2014	Cindy Ingersoll	Norwalk River Watershed Initiative	<p>We believe we can be a valuable resource for a number of the IAs identified in the LISS CCMP and would hope LISS make note of the potential partnership with NEW, Harbor Watch and other CT watershed organizations</p>	<p>These and other organizations were noted in action SM-29: Coordinate and target funding for implementation of protection and restoration, science, and education and involvement projects. In general, the final CCMP emphasizes the role that local watershed organizations have, rather than listing each organization specifically by name. This ensures that new organizations can understand their even in not listed by name..</p>
8	11/7/2014		NYSDEC	<p>How to address ongoing vs priority actions in IA tables?</p>	<p>The Implementation Actions (IAs) have been formulated to carry out the theme strategies. All IAs are important to meeting the plan's objectives and outcomes. While recognizing that the priorities of each implementing organization will vary according to its mission and the purpose of available funds, the CCMP identifies the highest overall priorities, whether for new or underway actions, by consensus of the Management Conference partners. Highest priority actions are indicated by a "diamond" symbol. The complete five-year implementation action plans (further described in Appendix C) are included in the supplement to the CCMP posted on the LISS website.</p>
9	11/7/2014		NYSDEC	<p>The order of the actions might be confusing to the reader. Suggest either listing priorities first or list according to the order of the strategies they line up with.</p>	<p>The final CCMP has a reorganized listing of the actions, relating them more clearly to the strategies and objectives which they relate.</p>

10	9/12/2014	Timothy Visel	The Sound School	Need to review long term climate patterns and impacts to fisheries instead of focusing solely on the human causes of the rise and fall of living marine resources. How much is "us" and how much is natural?	The final CCMP emphasizes the need to understand how climate change is affecting Long Island Sound. Climate change is an underlying principle included throughout the plan. Strategy 4-3a1 emphasizes the need to environmental drivers, including climate change in managing Long Island Sound. This topic will continue to be a priority for research. More generally, as noted on page 9, the CCMP continues to leave fisheries management to regional organizations charged with that task, thus avoiding duplication of effort.
11	9/12/2014	Timothy Visel	The Sound School	Some commercial fishers feel that the LISS is promoting a marine game preserve for the wealthy; much of the anger here is from the closure of the eastern CT alewife fishery and the absence of lobsters in Western CT	As noted on page 9 of the CCMP, the Long Island Sound Study continues to defer fisheries management to regional organizations charged with that task, thus avoiding duplication of effort. The CCMP instead focuses on improving habitat quality (e.g., water quality, habitat restoration) in order to provide the necessary conditions for fisheries
12	9/12/2014	Timothy Visel	The Sound School	Explore the concept of transferring management authority/oversight of alewife runs back to the towns (limited stewardship basis). The use to have this authority .	As noted on page 9 of the CCMP, the Long Island Sound Study continues to defer fisheries management to regional organizations charged with that task, thus avoiding duplication of effort. Regulatory authority over commercial and recreational fish species resides with state and federal agencies. The states of Connecticut and New York do not foresee a change in current oversight mechanisms for alewife species nor have they received any official requests from LIS municipalities to give them oversight over alewife (herring) runs. Some towns do, however, have some oversight over maintaining site-specific fish ladders (bypass structures) and dam removal/natural stream bed restoration projects.
13	9/12/2014	Timothy Visel	The Sound School	Address the temporal dredge windows issue.	The LISS funded a project to review the scientific knowledge on the temporal occurrence of living resources used as a basis for current temporal dredge window policies. The CCMP does not address this specifically, highlighting, instead, the need to manage dredged material consistent with a bi-state dredged material management plan.
14	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	May consider condensing the plan to show targets and action items only, removing outcomes and strategies to avoid overlaps and redundancy.	The CCMP has been re-drafted to focus more on the ecosystem indicators and targets. Outcomes and strategies remain as part of logic framework to attain the ecosystem targets. A separate stand-alone public summary of the CCMP does present only ecosystem targets and priority actions.

15	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Ensure that sustainable and resilient are clearly defined, especially if the meaning can vary if applied to different topics so that the words do have meaning towards proper implementation.	These terms are defined in the glossary.
16	9/16/2014	Bronx, NY Public Meeting	private stakeholder	Some actions and targets are repetitive and need to be more specific so towns can better use. Specific targets in the plan will help towns get funding, develop local plans, and go in front of planning boards.	The CCMP is a regional scale planning document. While town-level targets are not feasible, the CCMP is intended to highlight the important role of coordinated town action to a restored Sound. The CCMP actions have been extensively reviewed to eliminate redundancies.
17	9/16/2014	Bronx, NY Public Meeting	private stakeholder	Spatial distribution of some targets - should some targets be specific to certain geographic areas of the Sound?	The spatial nature of the targets will depend upon the target. Generally, the CCMP includes Soundwide targets. Achievement of the targets will require targeting and geographic focus.
18	9/16/2014	Westbury, NY Public Meeting	private stakeholder	Coastal habitat and tidal wetland habitat need to be defined in the CCMP	Coastal habitat refers to the 12 habitat types targeted for restoration by the LISS. Tidal wetland is one of those habitat types. These terms are defined in the CCMP glossary.
19	9/17/2014	New Haven, CT Public Meeting	private stakeholder	Need to be more transparent when coming up with numeric targets, need to show the research behind these values	Appendix B defines each ecosystem target and describes in detail how the ecosystem targets will be measured and tracked.
20	10/13/2014		STAC and CAC	The main weakness that our review of the draft identified is the failure to articulate bold and visionary goals for the future.	The final CCMP incorporates the bold vision as originally articulated in the 1994 plan; it also contains aggressive ecosystem indicators and targets to track improvements of the Sound in response to implementing the CCMP. A separate public summary, emphasizing its visionary aspects, accompanies the full CCMP.
21	10/15/2014		CAC	Focus the CCMP on fewer, stronger and clearer outcomes and priority actions. Set a bold vision and strategic course of action for the restoration of LIS	The CCMP continues the vision of the 1994 CCMP, adds four theme goals, and 20 aggressive and specific ecosystem targets. Each theme includes 12 priority actions with performance metrics.

22	10/15/2014		CAC	"Desired Outcomes and Targets" and "Top Actions" presented in the "Summary of the Draft Comprehensive Conservation and Management Plan Update" lack adequate specificity, focus and vision	This comment was based on review of the "Summary of the Draft Comprehensive Conservation and Management Plan Update" used to communicate to the public the key elements to the draft CCMP. The complete CCMP includes more detail on each target and the CCMP supplemental documents provide specificity and detail on each action. Also see response to comment #21.
23	10/15/2014		CAC	Several shared CAC priority outcomes and actions were either not included or not presented clearly.	Addressed in Final CCMP Resolution column line 80 and 81.
24	10/15/2014		CAC	CCMP narrative and Action appendices, while valuable for staff, are simply too cumbersome and detailed for practical application by members of the public, and contain far too many actions to be a meaningful blueprint tool	The final CCMP narrative is much reduced from the 1994 CCMP. It also has approximately 100 fewer actions and is reduced in length from 168 pages to 56 (not including appendices). It does include 20 new aggressive ecosystem targets to track improvements of the Sound in response to implementing the CCMP. It also highlights 12 priority actions within each theme. Finally, a separate public summary accompanies the full CCMP.
25	11/7/2014		NYSDEC	Appendix B: Public access to beaches and waterways -- Need to define this better what is a public access point ie one facility and who measure unobstructed shoreline miles ? so we can track	The ecosystem target for public access has been simplified to include only access points, which is much easier to define and track. Appendix B includes a detailed description of the target and how it relates to action SC-37, which calls for development of a public access plan for LIS.
26	11/7/2014	Sandy Breslin	Audubon NY and CT	The introduction to Draft CCMP Section 5. Thriving Habitats and Abundant Wildlife (HW), particularly the first paragraph, focuses heavily on the human benefits of protecting habitats and wildlife, including harvested species. This is a missed opportunity to promote the diversity and richness of species found in LIS and the importance of protecting the natural integrity of this incredible ecosystem. Doing so would help to inspire and engaged a broader audience.	The introduction to the Thriving Habitats and Abundant Wildlife theme has been modified to emphasize the importance of the natural diversity and richness of the LIS ecosystem.

27	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>Revise/Add habitat targets to: Restore a total of 2,000 acres of habitat, reopen 300 miles of river to fish Protect 2,600 acres of open space and coastal habitat through easements and land acquisitions, including protection of 680 acres of critical habitat on Plum Island.</p>	<p>The final CCMP includes aggressive targets for coastal habitat, riverine migratory corridors (RMC), and open space. For example, the open space targets exceed those recommended in the comment. New tools are under development in the next 1-3 years that will help in better identifying properties for protection. Leaving property acquisition more general allows for flexibility and the ability to incorporate info from the tools into decision making when they come on board. NYS has an Open Space Plan that identifies Plum Island as a target for acquisition. The New York open space target was determined based on the NYS Open Space Plan and past acquisition totals.</p>
28	11/7/2014	Sandy Breslin	Audubon NY and CT	<p>Add species targets for birds. Through habitat protection or restoration is a necessary target, for some species habitat protection alone is not sufficient. This is particularly true for beach nesting birds in LIS where experts identify human disturbance and associated predation as the primary threats to these species. Beach-nesting birds require active stewardship to reduce mortality, ensure nesting success and productivity, and meet desired population targets. Based on existing USFWS Recovery Plan targets and current research, we recommend adopting the following targets and goals:</p> <p>Reduce disturbance and increase productivity rates of beach and island nesting birds of conservation concern to achieve a 5-year average of 1.5 fledglings per pair for Piping Plover and strive to achieve a 5-yr average of 0.5 fledglings per pair for Leaster Terns and 1.0 fledglings per pair for Roseate Terns.</p> <p>Maintain a pop. of at least 5,000 Saltmarsh Sparrows based on recent unpublished input from experts and stakeholders.</p> <p>Set target for American Oystercatcher</p> <p>Protect, restore or enhance 500 acres of diverse stopover habitat to support avian species that migrate along the Atlantic Flyway. Key stopover habitats include coastal forests, shrub and grasslands, riparian corridors and public green spaces such as state and muni parks.</p>	<p>The final CCMP does not set targets for specific species recoveries to avoid redundancy with state and federal wildlife management plans. This avoids setting targets that could quickly become obsolete or contradictory to targets set by other planning efforts. Instead, the final CCMP recognizes the importance of wildlife management plans to set and work toward species restoration targets. The final CCMP does address the issue of disturbance and monitoring of birds in HW-17 and SC-10, 11, and 38. The importance of stopover habitat is included in action HW-1. Overall, the goal of the LISS is to improve the habitat conditions upon which wildlife depend rather individual species management plans.</p>

29	11/7/2014	Sandy Breslin	Audubon NY and CT	Add a target: # of acres of habitat stewarded or managed for wildlife or target species (whether public trust species, Species of Greatest Conservation Need (GCN) or species listed by the International Union for the Conservation and Nature and Natural Resources (IUCN))	The CCMP purpose is to protect multiple species. General habitat protection actions will protect multiple species. Setting targets for number of acres managed is not a useful metric for assessing the success of the habitat protection because there is no agreed upon methods for defining the range and depth of such management.
30	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Outcome 2-1: Ecosystem services are maintained by protecting, restoring, and enhancing habitats. This first outcome in the CCMP section on habitats and wildlife is focused on ecosystem services, a more human-centric outcome and not one that usually includes abundant wildlife as a metric. This outcome must be redrafted to place greater emphasis on protecting habitat for the needs of wildlife and natural resources in addition to ecosystem services and human benefits.	Change made as requested.
31	11/7/2014	Sandy Breslin	Audubon NY and CT	Re-order Strategy 2-2b1 and 2-1b2 Revise original strategy 2-1b1 to read: "Identify high priority areas to protect using a repeatable criteria-based process to minimize bias, supplemented by expert knowledge. Revise original strategy 2-1b2 to read: "Conserve and enhance natural areas and open space to benefit public access, recreation, shoreline, community protection, and wildlife.	Change to 2-2b1 made as requested. Change to 2-2b2 made to read "Conserve and enhance natural areas and open space to benefit ecosystem function and wildlife."
32	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Strategy 2-1c2 to read: Identify and prioritize upland and aquatic habitats that are vulnerable to climate change impacts and take action to mitigate or adapt this impacts (e.g., remove or mitigate impediments to coastal processes, beach-dune dynamics, habitat/marsh migration)	Merged draft CCMP strategy 2-1c1 and 2-1c2 into new 2-1c1, which reads "Identify and prioritize upland, wetland, and aquatic habitats that are vulnerable to climate change impacts and take action to mitigate or adapt to these impacts (e.g., remove or mitigate barriers to habitat migration). Climate change resiliency is included across multiple themes. There are a variety of tools (TNC models, LCC CT River Pilot, SLAMM) that evaluate habitat impacts under different climate scenarios.
33	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-1c3: Identify and prioritize protection of marsh migration and other habitat corridors.	2-1c1 addresses this issue implicitly. Also HW-5 addresses marsh migration.
34	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Objective 2-2d to read: To maintain or improve diverse/resilient communities of native fish, birds, and wildlife.	Change made as requested.
35	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-2d3: Establish a sustainable program of annual monitoring and stewardship of public trust or other target species that engages citizen scientists.	Species monitoring that engages citizen science is included in Implementation Actions HW-14, HW-16, and HW-21.

36	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-2d4: Develop and launch a plan to identify, protect, and restore priority stopover habitat areas for migrant landbirds and shorebirds that use LIS. Key stopover habitats include coastal forests, shrub and grasslands, riparian corridors and public green spaces such as state and muni parks.	Implementation action HW-1 considers the importance of stopover habitat is setting restoration priorities.
37	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-3a2: Establish a sustainable program of annual monitoring and stewardship of public trust or other target species that engages citizen scientists, volunteers and/or provides employment opportunities for youth.	Species monitoring that engages citizen science is included in Implementation Actions HW-13, HW-16, and HW-21.
38	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Objective 2-3b to read: To engage the public, particularly in urban areas, in both large and small-scale habitat restoration projects, research, monitoring, outreach, management, and stewardship.	Draft CCMP Objective 2-3b is Final CCMP Objective 2-3a and reads " To educate and engage the public, particularly in urban areas, in both large and small-scale habitat restoration projects, research, monitoring, management, and stewardship associated with priority habitat types and living resources:"
39	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Objective 2-3d: To reduce human disturbance to wildlife and promote a 'Share the Shore' ethic.	Addressed in Strategy 2-2b2. While a specific programs, initiative, or slogan is not mentioned, the concept is captured in the strategy and in the associated action, HW-17: Reduce and manage threats to populations of targeted listed species.
40	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-3d1: Promote the creation of educational and outreach programs to reduce recreational disturbance of wildlife, especially to public trust species.	Addressed in Strategy 2-2b2. Education and Outreach programs are found in Objective 2-3 and in the Sustainable and Resilient Communities Theme.
41	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-3d2: Focus education and outreach at stewardship areas, adjacent priority habitats and with adjacent landowners on reducing human disturbance of priority species.	Education and outreach at stewardship areas is expanded upon in the Sound Communities theme under Strategy 3-1c1: Involve the public in the cleanup and restoration of Long Island Sound through volunteerism and community action, and Strategy 3-1c2: Encourage residents, both homeowners and renters, to engage in environmentally-friendly practices around their homes and communities.
42	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Strategy 2-4a2 to read: Inventory trends in quality, quantity, and distribution of priority habitats and species.	Change made as requested.
43	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-4a3: Monitor and track the population size of beach nesting and shorebirds.	This is considered part of an action in HW-16
44	11/7/2014	Sandy Breslin	Audubon NY and CT	Add new Strategy 2-4a4: increase our understanding of the LIS food web by monitoring key avian forage species, e.g. sand lance, horseshoe crabs	We added some information on forage species to HW-16 in the Habitats and Wildlife supplemental document.

45	11/7/2014	Sandy Breslin	Audubon NY and CT	Actions associated with Outcome 2-1 (HW-1 through HW-9) are focused on tool development and data collection, but there is no discussion of how the IAs will be informed by application of the tools and data. These bullets should be revised to discuss how implementation will be amended as new info is generated and gathered. As adaptive management is a theme in other sections of the CCMP, it must also be prioritized here.	This is addressed in the outputs for individual Implementation Actions in the Habitats and Wildlife supplemental document.
46	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise HW-15 to "Reduce and manage threats, monitor, and steward populations of targeted listed species."	Draft CCMP HW-15 is now final CCMP HW-17 and reads "Reduce and manage threats to populations of targeted listed species."
47	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Thriving Habitats and Abundant Wildlife Goal to be: "Restore and protect the Sound's ecological balance in a healthy, productive, and resilient state to support fish and wildlife and to benefit people."	The Thriving Habitats and Abundant Wildlife Goal theme goal was revised to read "Restore and protect the Sound's ecological balance in a healthy, productive, and resilient state to benefit both people and the natural environment."
48	9/16/2014	Carol DiPaolo and Jane Jackson, Westbury, NY Public Meeting	private stakeholder	Open Space Protected: New York needs to be represented too	A New York open space protection target was added to the final CCMP.
49	10/20/2014	Denise Savageau, Greenwich, CT	private stakeholder	Outcome 2-1: Ecosystem services are maintained... Should we discuss or have as an objective how to coordinate with USFWS. Two wildlife refuges McKinney and Conti are active. Also the USFWS is working on Regional Conservation Partners within the watershed.	USFWS is identified as a partner entity on many of the actions detailed in the supplemental support document for the Thriving Habitats and Abundant Wildlife theme. Coordination is also considered in strategies and actions under the Science and Management Objective 4-2a: To increase communication, coordination, and reduce institutional barriers to cooperation on an ecosystem level among all levels of government, stakeholder groups, and the general public.
50	9/16/2014	Jane Jackson, Westbury, NY Public Meeting	private stakeholder	The phrase "natural vegetation" is used in the Riparian buffer target. Should it be replaced by "native vegetation" since "natural" may still include invasive species?	"Natural" was not replaced by "native" since the objective is to increase vegetation natural to the riparian areas, not just native to the region. The CCMP overall promotes the reduction of invasive species, so they are not considered to be suitable as natural riparian vegetation.
51	11/7/2014		NYSDEC	Strategy 2-1a3: "Identify water quality conditions necessary to support priority habitats and use suitability models to evaluate appropriate restoration priorities through pollution controls" -- Awk sentence, Not sure what this means. Maybe remove (I think want to say that pollution controls would attain that condition and get the habitat back	Strategy removed as requested.

52	11/7/2014	NYSDEC	<p>Strategy 2-1b2: "Conserve and enhance natural areas and open space to benefit public access, recreation, shoreline, and community protection" --What about adding protect thru development of standards or regulation what I am getting at is water quality standards for eel grass? How can we or does that fit in here or is it in above 2-1a3.</p>	<p>Developing and applying water quality criteria may be a component to attaining two ecosystem targets. 1) Water Clarity: Improve water clarity by 2035 to support healthy eelgrass communities and attainment of the eelgrass extent target, 2) Eelgrass Extent: Restore and maintain 2,000 additional acres of eelgrass by 2035 from a 2012 baseline of 2,061 acres. Implementation action HW-24 promotes eelgrass management, as does and Strategy 2-4a4: Identify water quality conditions necessary to support priority habitats and use suitability models to evaluate appropriate restoration priorities through pollution controls.</p>
53	11/7/2014	NYSDEC	<p>change to read: Strategy 2-1c1: Promote the use of living shoreline and other habitat protection and restoration methods for dunes, shorelines, and coastal marshes</p>	<p>This strategy was removed and became an action (HW-11).</p>
54	11/7/2014	NYSDEC	<p>change to read: Strategy 2-1c2: Identify and prioritize upland, wetland, and aquatic habitats that are vulnerable to climate change impacts and take action to mitigate or adapt to these impacts (e.g., remove or mitigate impediments to coastal processes, habitat migration, appropriate restoration techniques)</p>	<p>Strategy is now 2-1c1 and reads "Identify and prioritize upland, wetland, and aquatic habitats that are vulnerable to climate change impacts and take action to mitigate or adapt to these impacts (e.g., remove or mitigate barriers to habitat migration)."</p>
55	11/7/2014	NYSDEC	<p>Strategy 2-2b2: Advance research and manage habitat and threats to protect targeted Trust species (e.g. climate change driven threats and predator-prey relationships) -- Perhaps to address CAC concerns for specificity about bird needs as examples here or other appropriate objectives below. I know DEC is doing skimmer work, should talk to Jason Smith about it to perhaps add as a IA.</p>	<p>Actions HW-15, 16, 17, and 19 encompass the type of activities recommended by the CAC.</p>
56	11/7/2014	NYSDEC	<p>Outcome 2-4: Knowledge of habitats and living resources is advanced through monitoring, assessment, and research. Perhaps need to more clearly talk about the need in here to assess impacts of N and other factors like sediment accumulation and SLR on wetlands and impacts of water quality on eel grass. Perhaps here and in an IA</p>	<p>Strategy 2-4a4 now addresses the need to relate water quality conditions to habitat health. Implementation Action HW-26 also explicitly mentions impacts on tidal wetland (consistent with the LIS Tidal Wetlands Loss Workshop, 2014).</p>
57	11/7/2014	NYSDEC	<p>Strategy 2-4a1: Support ecosystem science research to enhance protection of living terrestrial and aquatic resources for example support important habitat modeling and[DM1] landscape design efforts. -- Also water quality (N) related research and suitability for eel grass</p>	<p>Strategy 2-4a4 now addresses the need to relate water quality conditions to habitat health. Strategy 2-4a1 now reads "Support ecosystem science research such as habitat modeling and landscape design efforts to enhance protection of living terrestrial and aquatic resources."</p>

58	11/7/2014	NYSDEC	<p>Table 2. Thriving Habitats and Abundant Wildlife Implementation Actions -- Have to add conduct habitat trends analysis (wetlands) unless this is in HW 5 and 6 and on a periodic basis continue SET monitoring. Also need something here about assess and monitor wetland quality including sediment and water quality. Perhaps the quality IAs need to be clearly written to also include this.</p>	<p>Habitat trend analysis is addressed under Strategy 2-4a2: Inventory status and trends in quality, quantity, and distribution of priority habitats and species. Also, HW-22 recommends data collection on targeted habitat types and HW-26 addresses wetland quality; HW-5 addresses SET monitoring.</p>
59	11/7/2014	NYSDEC	<p>Make HW-7, 8, and 13 priorities</p>	<p>All suggested actions have been made priorities. The final CCMP now lists them, respectively, as HW-5: Use remote sensing, mapping tools, modeling, and field verification to determine sites that are likely to be impacted by sea level rise, and which sites are ideal for habitat migration; HW-8: Use leading-edge design tools to prioritize future conservation investment and management plan development for Long Island Sound's most significant and imperiled terrestrial and intertidal coastal habitats; and HW-9: Conduct an ecological assessment of land surrounding Long Island Sound Stewardship Sites and design green infrastructure/low impact development pilot projects that minimize negative impacts and enhance beneficial ecosystem services of lands within or surrounding the Sites.</p>
60	11/7/2014	NYSDEC	<p>HW-10 Develop a habitat quality assessment tool for research and analysis. -- how is this different from HW-9</p>	<p>These 2 IAs have been combined as HW-6.</p>
61	11/7/2014	NYSDEC	<p>Make the following priority actions: HW-7, HW-8, HW-13</p>	<p>All suggested actions have been made priorities. The final CCMP now lists them, respectively, as HW-5: Use remote sensing, mapping tools, modeling, and field verification to determine sites that are likely to be impacted by sea level rise, and which sites are ideal for habitat migration; HW-8: Use leading-edge design tools to prioritize future conservation investment and management plan development for Long Island Sound's most significant and imperiled terrestrial and intertidal coastal habitats; and HW-9: Conduct an ecological assessment of land surrounding Long Island Sound Stewardship</p>
62	11/7/2014	NYSDEC	<p>HW-5 ..."Establishing metrics and assessment methodology allows us to better understand the condition of our habitats and how they have changed over time. " - Is this qualitative or quick method rapid assessment as compared to HW-11?</p>	<p>This is now HW-6. Emphasis is on quantitative assessments using available data for additional rapid assessments of sites.</p>

63	11/7/2014		NYSDEC	HW-5 Cooperators and Partners "USFWS, LISS HRWG, TNC-NY, NYSERDA, NYC DPR, CT DEEP, Other state federal and non-profit partners as expertise is needed" - Why not DEC? Also have to have an IA that looks at tidal wetlands trends analysis on a periodic basis, either added in here or separately.	This is now HW-6. The Habitats and Wildlife Supplemental document detail on this action now includes NYSDEC as a partner and more information on the tidal wetland trends analysis.
64	11/7/2014		NYSDEC	HW-6: "Develop a habitat quality index for tracking habitat restoration projects and programs." - This is not a quality index, it is a tracking project.	Action is now HW-7. Change made as recommended. It now reads: "Develop a habitat quality index for tracking the success of habitat restoration projects and programs on habitat quality."
65	11/7/2014		NYSDEC	HW-10 Assume this is just more scientifically rigorous habitat assessment as compared to actions above. If so, need to better differentiate.	This IA was deleted
66	11/7/2014		NYSDEC	HW-10 Cooperators and Partners -- Why not DEC?	This IA was deleted
67	11/7/2014		NYSDEC	HW-11 - Need to include development of monitoring protocols (biological and other monitoring) and promoting development of living shoreline definitions and criteria for use.	These changes have been made to HW-11 in the Habitats and Wildlife Supplemental document. The action now reads: HW-11: Develop and promote the use of living shoreline habitat protection methods (dunes, shorelines, coastal marshes) and living shoreline monitoring protocols.
68	9/17/2014	Sandy Breslin, New Haven, CT Public Meeting	Audubon NY and CT	Need to set more specific targets for species, especially for birds? With respect to bird species, don't see a recognition or a call for investing in ongoing inventorying of species, and I would question that because habitat protection can only go so far, management is a big part too	See response to line 28.
69	9/12/2014	Timothy Visel	The Sound School	Need studies about blue crabs. Create new salt ponds for habitat. Dock space and access to the blue crab population is presently a huge concern.	Justification and rationale is lacking for removing productive tidal marsh soils to create crabbing ponds. State and federal regulations would most likely not authorize this given the amount of area available for crabbing along tidal creeks. In addition, Blue Crab studies would fall under the development of new science priorities (in SM theme).
70	9/12/2014	Timothy Visel	The Sound School	Anything the CCMP about creating artificial reefs for recreational fisherman and to create habitat?	Artificial reefs can be habitat; but areas where oysters are harvested do not provide meaningful reef habitat for reef organisms. We have outlined living shorelines in the IAs (HW-11 and HW-12), which can include reefs. This would be just habitat and wildlife, not to specifically to benefit fisherman. We also promote HW-1, which includes all priority habitat, including shellfish reefs.
71	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Strategy 2-1a3, supplement current language with: Integrate/modify MS4s, SPDES, and TMDLs and their resulting water quality improvements into shoreline habitat planning.	Strategy reworded and renumbered to 2-4a4, which captures the general concept. More detail on MS4s, SPDES, and TMDLs is relating to water quality is found in the Waters and Watersheds theme.

72	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Strategy 2-1c1, supplement current language with: Develop permitting strategies that require/encourage the use of living shorelines for habitat protection and enhancement.	Changes made as requested. This statement and concept is added to all of the living shoreline related IAs. This is essential for NY and it will take a long time to change the regulations.
73	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Partner with fisheries and shellfish management organizations to better understand the habitat value of LIS for critical species and then develop guidelines for preservation and enhancement of those habitats.	This is partially addressed in HW-16: Collect data on, and restore habitat for, listed and forage species and HW-17: Reduce and manage threats to populations of targeted listed species. More generally, the habitat types targeted for restoration and protection are those that have established habitat value for living resources.
74	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Make HW-20 a priority action	Now listed as HW-18: Develop a shellfish management plan that supports BMPs for aquaculture, recreation, and restoration that ensure sustainable marine populations. While this is not listed among the 12 priority actions, the action has already been initiated.
75	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Add HW-23: Integrate stormwater quality and shoreline habitat restoration planning, modeling, and monitoring.	These topics are more generally covered in the Sustainable and Resilient Communities theme, particularly under Objective 3-4a: To encourage and facilitate the development of regional, state, and local sustainability, mitigation, and resiliency plans and integrate them into community comprehensive plans, and Objective 3-4b: To develop and implement sustainability and resiliency plans for new and existing development, housing, transportation, emissions control, energy efficiency, and job creation programs for all municipalities.
76	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Shellfish harvested target, supplement current language with: Increase suitable shellfish habitat by XX% to allow for the potential for increased harvest goals.	The ecosystem target related to shellfish is "Approved Shellfish Areas: Upgrade 5 percent of the acreage restricted or closed for shellfishing in 2014 by 2035." Actual shellfish harvest is subject to multiple factors, including disease and storms. The CCMP focus is on improving water quality to reduce harvest restrictions. One of the 12 targeted habitat types is shellfish reefs, which provide habitat for other organisms (and not oysters for harvest). The Waters and Watersheds theme also includes "WW-21: Improve the permitting and certification process for new aquaculture projects with products intended for human consumption, particularly those projects with a bioextraction focus," which would remove barriers to aquaculture expansion.

77	9/16/2014	Bronx, NY Public Meeting	private stakeholder	<p>Look at available land area for habitat restoration targets to make sure they are attainable</p>	<p>Habitat targets have been set in the past based on experience with prior restoration efforts and the availability of funds. As set out in <i>Strategy 4-3b1: Establish baselines of historical or pre-historical conditions of ecosystem attributes and magnitudes of change to help provide a basis for setting restoration goals</i>, the CCMP advocates for improving the science upon which restoration efforts are based.</p>
78	10/15/2014	CAC		<p>There is a difference between realistic and inspirational targets in coastal habitat extent: Need to look at amount of land available for habitat restoration before coming up with numerical targets; set a target that is more of a change in trend or continuing trend, instead of static numerical targets</p> <p>Add or incorporate HW outcomes:</p> <ol style="list-style-type: none"> 1. Restore a total of 2,000 acres of habitat and reopen 300 miles of river to fish. 2. Protect 2,600 acres of open space and coastal habitat identified in the LIS Stewardship Initiative through easements and land acquisitions, including protection of 680 acres of critical habitat on Plum Island. 3. Reduce disturbance and increase productivity rates of beach and island nesting birds of conservation concern to achieve a five year average of 1.5 fledglings per pair for Piping Plover and strive to achieve a five-year average of 0.5 fledglings per pair of Least Terns. 4. Protect, restore or enhance 500 acres of diverse stopover habitat for avian species migrating along the Atlantic Flyway. 5. Maintain and restore diverse, balanced, and abundant populations of fish, birds, and other wildlife. 	<p>After extensive analysis, the final CCMP includes aggressive but attainable ecosystem target, including: 1) Restore 350 acres of coastal habitat by 2020 and a total of 3,000 acres by 2035 from a 2014 baseline, including restore and maintain 2,000 additional acres of eelgrass by 2035 from a 2012 baseline of 2,061 acres and restore 515 additional acres of tidal wetlands by 2035 from a 2014 baseline, and open 200 additional miles of fish riverine migratory corridors in the Connecticut and New York portions of the watershed by 2035 from a 2014 baseline. 2) Conserve an additional 4,000 acres of Connecticut land and 3,000 acres of New York land within the LIS coastal boundary by 2035, while maintaining the total area of protected lands. Plum Island is included in the NYS Open Space Plan and is mentioned in the CCMP supplemental documents detailing the implementation actions. As noted in line 28, the CCMP does not set targets for specific species recoveries to avoid redundancy with state and federal wildlife management plans. This avoids setting targets that could quickly become obsolete or contradictory to targets set by other planning efforts. Instead, the final CCMP recognizes the importance of wildlife management plans to set and work toward species restoration targets. HW-19 was created to clarify this. The disturbance issue is factored into HW-17. Comment 4 is included in the coastal habitat, tidal wetlands targets and in HW-1. Comment 5 is stated in outcome 2-2 and Strategy 2-2d1.</p>

Add or incorporate HW top actions:

- (a) By 2018: Identify priority riparian, upstream and undeveloped uplands in coastal watersheds as well as riparian floodplains and floodways for habitat restoration efforts.
- (b) By 2018: Identify priority open space and coastal habitat identified by the LIS Stewardship Initiative for land protection efforts.
- (c) By 2016: Establish a sustainable program of annual stewardship and monitoring of federal and state listed bird species. Engage citizen scientists and provide youth employment and educational opportunities.
- (d) By 2016: Identify and set goals for protecting existing and emerging habitat areas for American Oystercatcher.
- (e) By 2020: Increase monitoring and restoration efforts of forage species for bird, e.g. sand lance, horseshoe crabs.
- (f) By 2020: Identify priority habitat areas for migrant landbirds and shorebirds along the shores of LIS as part of the Atlantic Flyway. Develop plan to protect, restore and enhance these habitats.
- (g) By 2020: Identify conservation and restoration plans for submerged habitats. Develop priorities for protection through mapping and spatial planning activities for seagrass, shellfish, rocky reefs, deepwater coral/sponges.
- (h) By 2020: Identify priority upland and aquatic habitats and species vulnerable to climate change impacts. Develop action plans to mitigate or adapt to these impacts (e.g., remove or mitigate impediments to coastal processes, habitat migration, dune and beach system protection and enhancement and marsh restoration and enhancement projects).

(a) Strategy 2-1a1 and Strategy 2-1a2 covers this comment, along with associated actions. (b) Objective 2-1b (c) Strategy 2-2b1 and HW16 address this concept (d) Strategy 2-2b1 and HW16 address this concept (e) Strategy 2-2b1 and HW 16, Strategy 2-2b2 and HW 17 (f) Objective 2-1b (g) Strategy 2-4a2 HW-23 (h) Objective 2-1c

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Open Space Protected: Is there anywhere in the Plan where there is a template of how the coast should be treated and developed? BMPs should be outlined in the plan and how much land should be left open for the health of the Sound. As water becomes cleaner, more development.

Much of the coast is already developed, with some areas for recreation and open space in between. Given the already high level of development, the CCMP recommends protecting as much undeveloped land as possible. As set out in *Strategy 4-3b1: Establish baselines of historical or pre-historical conditions of ecosystem attributes and magnitudes of change to help provide a basis for setting restoration goals*, the CCMP advocates for improving the science upon which restoration efforts are based. Redeveloping the shore, while rare, does happen, and there are programs to support this (e.g. brownfields). This issue is covered in the SC the actions (resiliency and sust planning and implementation).

80 9/16/2014 Carol DiPaolo, Westbury, NY Public Meeting private stakeholder

81	9/16/2014	Westbury, NY Public Meeting	private stakehold	CCMP includes a target about increasing shellfish harvests, but why aren't finfish recognized in the CCMP; need to explain why they aren't in the CCMP, so its understood why they are not included	As noted on page 9 of the CCMP, the Long Island Sound Study continues to defer fisheries management to regional organizations charged with that task, thus avoiding duplication of effort. Regulatory authority over commercial and recreational fish species resides with state and federal agencies.
82	11/7/2014	Sandy Breslin	Audubon NY and CT	The final CCMP should seek to maximize conservation opportunities by promoting planning and implementation actions that provide multiple benefits, especially for wildlife. This is mentioned in the Healthy Habitats and Abundant Wildlife (HW) Section, but opportunities exist in each section to incentivize and achieve progress toward multiple goals. Ex. green infrastructure installations that provide bird or pollinator habitat, resiliency projects that create new or enhance existing habitat for birds or other wildlife, habitat restoration projects that add or expand capacity to manage stormwater or enhance community resiliency should be identified and enhanced in the final CCMP.	This concept is understood throughout all of the HW theme actions and all other themes. It is understood that a project can have multiple direct and indirect benefits to wildlife, habitat, and water quality.
83	10/13/2014		STAC and CAC	Quantitative goals (for water quality improvement, habitat protection and species population levels) should be included wherever possible. These should not be constrained by what is thought to be achievable by current technology and policy. The plan should drive innovation.	The CCMP contains two types of ecosystem targets (1) numeric, e.g, hypoxia, sediment quality, acres restored) and (2) trajectory, e.g., water clarity, shellfish harvest). The ecosystem targets are intended to be aggressive, but attainable. Innovation and investment will be needed to attain the targets.
84	11/7/2014		NYSDEC	OK executive summary, but we absolutely still need the small glossy document that be presented to elected and others to secure funding that represents priorities and needs of the LISS and answers the big question - what do you need funding for?	A public summary of the final CCMP has been prepared. The final CCMP also includes a section on Funding Strategies that discusses funding needs.
85	11/7/2014		NYSDEC	No period after et in "et al."	Change made as recommended.
86	11/7/2014		NYSDEC	Made some grammatical changes in Section 1. Please see word document.	Changes made as recommended.
87	11/7/2014		NYSDEC	Need better LIS study area map	Figures 2-4 of final plan show the region and study area.

88	11/7/2014	NYSDEC	<p>"What Underlying Principles Guide the CCMP Update? Throughout the four themes, the CCMP incorporates integrative principles that have emerged as key challenges and environmental priorities. These include resiliency.." can we explain a little more by what is meant by integrative principles?"</p>	<p>The underlying principles was reduced to three in the final CCMP. They are resiliency to climate change, long-term sustainability, and environmental justice. The language to each was revised in the final CCMP. Each are challenges and environmental priorities that cross any one theme. Actions to address each are integrated throughout the CCMP.</p>
89	11/7/2014	NYSDEC	<p>Should define "natural infrastructure" in glossary</p>	<p>Green infrastructure is defined in the glossary of the final CCMP.</p>
90	11/7/2014	NYSDEC	<p>"Nitrogen loading: Attain WWTF nitrogen-loading at the recommended 2000 Dissolved Oxygen TMDL allocation level by 2017 and maintain the loading cap. Have all practices and measures installed to attain the allocations in nonpoint source inputs from the entire watershed by 2025." -- is WWTF spelled out above anywhere and what are the NPS allocations?</p>	<p>WWTF is defined in the final CCMP and included in the list of acronyms. The nonpoint source allocations are defined in the Total Maximum Daily Load to Attain Water Quality Standards for Dissolved Oxygen in Long Island Sound (CTDEP, NYSDEC 2000). Progress in meeting those allocations has been assessed and published on NEIWPC's website related to the Long Island Sound Study.</p>
91	11/7/2014	NYSDEC	<p>"Riparian buffer extent: By 2035, increase natural vegetation within 300 feet of any stream or lake by 10 percent compared to 2010 baseline of 65 percent." -- we measure this?</p>	<p>Yes. Land cover analysis conducted by UCONN CLEAR has published data on riparian buffer extent.</p>
92	11/7/2014	NYSDEC	<p>Strategy 1-1a3: Develop pathogen Total Maximum Daily Load or alternate control plans for Long Island Sound Study harbors, coasts, and embayments using the existing pathogen Total Maximum Daily Load -- Not sure what using the existing pathogen tmdl load means...not all embayments have them ...do they? Perhaps leave out using existing tmlds. They have been problematic so not good to use as example</p>	<p>That strategy was eliminated. Addressed under Strategy 1-3b4: Research, monitor, and assess pathogens, their sources and their impacts on water quality. WW-31: Assess sources of nutrient and pathogen contamination to Long Island Sound embayments.</p>
93	11/7/2014	NYSDEC	<p>Strategy 1-3b1: Research, monitor, and assess sources (e.g., watershed, groundwater, atmospheric deposition) and sinks of nutrients and their impacts on water quality -- And habitats...getting at wq impacts on eel grass wetlands etc.</p>	<p>Water quality impacts to eelgrass are covered in numerous strategies and actions, including <i>Strategy 1-3b1: Improve identification and source tracking of nonpoint sources (e.g., watershed, groundwater, atmospheric deposition) and sinks of nutrients and their impacts on water and habitat quality</i> and <i>SM-13: Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watersheds.</i></p>
94	11/7/2014	NYSDEC	<p>Strategy 1-3b3: Improve identification and source tracking of NPS nutrients and contaminants -- Also Pathogens ie improve upon methods of in situ measuring of pathogens</p>	<p>Added language into new <i>Strategy 1-3b4: Research, monitor, and assess pathogens, their sources and their impacts on water quality</i>, and <i>WW-31: Assess sources of nutrient and pathogen contamination to Long Island Sound embayments.</i></p>

95	11/7/2014	NYSDEC	<p>Strategy 1-3b5: Research, monitor, and assess emerging and legacy contaminants and their impacts on water quality</p> <p>Strategy 1-3b6: Improve understanding of impacts of climate change (e.g., acidification, sea level rise, temperature) on Long Island Sound water quality and biota -- need to incorporate impacts on habitat quality in both of these strategies</p>	<p>Added language referencing impacts to habitat quality to renumbered <i>Strategy 1-3b2: Research, monitor, and assess emerging and legacy toxic contaminants and their impacts on water and habitat quality</i> and <i>Strategy 1-3b3: Improve understanding of climate change impacts (e.g., acidification, sea level rise, temperature) on Long Island Sound water and habitat quality and biota, and their interaction with other water quality issues (e.g., eutrophication).</i></p>
96	10/20/2014	Denise Savageau Greenwich, CT	<p>Outcome 3-1: Residents have the awareness... Need to expand to education/outreach to the entire watershed</p>	<p>The details in the supplemental document for Action SC-6 include providing outreach to upper basin states.</p>
97	10/20/2014	Denise Savageau Greenwich, CT	<p>Objective 3-2a: "To incorporate LIS topics... Into NY and CT classrooms and curriculum." All watershed states - not just CT and NY</p>	<p>The details in the supplemental document for Action SC-16 were amended to include providing technical advice to educators on setting up a mentor teachers program and sharing instructional materials with teachers in the upper basin states.</p>
98	10/20/2014	Denise Savageau Greenwich, CT	<p>How are we involving the upper basin states in this area? Referring to Sustainable and Resilient Communities</p>	<p>Outcome 3-3 addresses the need to ensure that all stakeholders, including those in the upper basin states, have resources to undertake collaborative efforts to restore and protect the Sound.. This includes materials proposed to be developed in SC-23 and SC-24. <i>Strategy 4-2a4: Enhance opportunities for cooperation and involvement of the tributary states of Massachusetts, New Hampshire, Rhode Island, and Vermont to address stressors that contribute to downstream effects on LIS</i> in the Science and Management theme also addresses this need.</p>
99	9/16/2014	Jennifer Wilson-Pines, Westbury, NY Public Meeting private stakeholder	<p>We need to have better communication to the public about closing public beaches triggered by rainfall; people automatically assume that they should be swimming in sewage if beaches are closed even if it is just because of rainfall (even if eventually tests come back and say no bacteria and beaches were fine) - PR nightmare</p>	<p>Action SC-8 addresses need to raise awareness for all water quality conditions that could impact human health. This is also addressed in <i>Strategy 1-2b2: Reduce human health risks through increased or targeted pathogen beach and embayment monitoring and fish and shellfish contaminant testing. WW-19: Encourage state and local health departments to adopt emerging rapid bacterial detection technologies that would allow shorter duration administrative beach/shellfish closings than those based on rainfall only.</i></p>
100	11/7/2014	NYSDEC	<p>Waterfront communities with resilient shorelines and sustainable, resilient infrastructure: By 2035, all waterfront communities have developed plans for shoreline resiliency and infrastructure sustainability and resiliency, with half actively implementing them. -- Trackability? Who track and how get that info...should be in definition</p>	<p>Appendix B details each ecosystem target, indicating the source data and how it will be used to assess the target.</p>

				<p>Harbors and bays with navigable channels that are maintained sustainably: By 2025, 100 percent of Long Island Sound harbors/bays will be maintained with navigable channels consistent with the Dredged Material Management Plan being developed. -- Trackability . Who will track it is a combination of local munis fed agencies that do this. No one database. Is this saying all navigable channels will be maintained and in a manner consistent with the DMMP being develop</p>	<p>The ecosystem target in teh Sustainable and Resilient Communities theme has been revised to read "Harbor and Bay Navigability: Maintain all federal navigation channels in harbors and bays and manage dredged material in a cost-effective and environmentally sound manner, consistent with a bi-state Dredged Material Management Plan, by 2035." Details on this target are provided in Appendix B of the CCMP. The action related to dredging is <i>SC-33: Develop and implement the Long Island Sound Dredge Material Management Plan</i> .</p>
101	11/7/2014		NYSDEC	<p>Speak to completion of the DDMP in an action strategy and or objective so that dredging is approached in manner documented in the dmmp (ex in a sustainable manner). LISS shouldn't have a major role in the dmmp but the states do as well as epa. All of the env plus practices the LISS does like promoting LID, sediment retention and other sustainable practices all assist in cleaner sediment and easier/less dredging ...eventually. LISS has in the past assisted in some of the science around dredging sustainably (env windows for protection of fish as an example)</p>	
102	11/7/2014		NYSDEC	<p>Make SC-6, 9, 31 priority actions</p>	<p>SC-6 is a priority action along with SC-31, now SC-37. SC-9, now SC-8 is not one of the 12 priority actions.</p>
103	11/7/2014		NYSDEC	<p>Make the following priority actions: SC-6, SC-27</p>	<p>SC-6 is a priority action as is SC-27, now SC-30.</p>
104	10/27/2014	Sally Pritchard	Old Saybrook	<p>CT should enact a ban similar to WA that has banned certain types of lawn chemicals to protect its waterways and fish populations. Should also focus on educating the public about organic lawn care. Organic lawn care is a viable alternative to chemical use. There is no public awareness here in Old Saybrook of organic lawn care.</p>	<p>This issue is addressed in <i>Strategy 3-1c2: Encourage residents, both homeowners and renters, to engage in environmentally-friendly practices around their homes and communities</i> .Organic lawn care is addressed through the coastal certificate program (SC-13), with outreach a key component and through general education (SC-14). A ban would require legislation.</p>
105	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Waterfront communities with resilient shorelines and sustainable, resilient infrastructure target: Consider adding language that resilient, sustainable shorelines must not sacrifice proper ecosystem function.</p>	<p>In the description of the Waterfront Community Resiliency and Sustainability ecosystem target (All coastal municipalities have prepared plans for shoreline resiliency and infrastructure sustainability and resiliency by 2025, with all future development compliant with those plans by 2035) in Appendix B the following language was added: "The implementation of these plans should not sacrifice ecosystem integrity"</p>

106	11/7/2014	Vince DeCario Msc, P.E.	Water and Coastal Resources Engineering	Public beaches are open and safe for swimming target: Consider adding language that encourages the integration of stricter MS4 and SPDES permit limits near public beaches.	The ecosystem target for Public Beach Closures (Reduce by 50 percent the number of beaches reporting at least one closure day or the total number of beach-day closures per monitored beach due to water quality impairments by 2035, compared to a five-year rolling average from 2014) focuses on the outcome. The objectives, strategies, and actions address how to attain targets.
107	11/7/2014	Vince DeCario Msc, P.E.	Water and Coastal Resources Engineering	Objective 3-4a: Consider adding language to the effect that hazard mitigation planning cannot sacrifice the shoreline ecology (i.e. less shellfish or fisheries habitat or increased eutrophication.	Objective 3-4a was modified to read "To encourage and facilitate the development of regional, state, and local sustainability, mitigation, and resiliency plans and integrate them into community comprehensive plans."
108	11/7/2014	Vince DeCario Msc, P.E.	Water and Coastal Resources Engineering	Consider adding SC-xxx to read: Quantify suitable shellfish habitat areas and develop a planning manual that integrates MS4, SPDES, LTCPs, CEHAs, and waterfront plans to develop a planning and design manual for the enhancement of suitable shellfish habitat at LIS shorelines.	CT Sea Grant is undertaking a comprehensive effort to develop a shellfish management plan for CT state waters that will include commercial and recreational resources. The overall plan is identified as an action in the CCMP. Individual components of that plan will address many of the topics listed in the comment.
109	11/7/2014	Vince DeCario Msc, P.E.	Water and Coastal Resources Engineering	Consider adding SC-xxx to read: Develop dredged material management plans that integrate the effects of larval (fish and shellfish) and seed (spartina, eelgrass) transport and settlement in the presence of deep navigation channels and perhaps define sensitive or off limit areas to dredging (or limits on max. depth)	added a new action (SC-33) under strategy 3-4b3; renumbered activities; adjusted the text accordingly.
110	9/16/2014	Bronx, NY Public Meeting	private stakeholder	- Sustainable infrastructure does not necessarily get at the overall problem of towns needing/wanting to develop for tax revenue - There is a reality of towns proposing and building sustainable infrastructure, but they are not maintained so no longer provide the permitted and intended purpose (ex. abandoned rooftop gardens)	The CCMP highlights the need for both sustainable and low impact development. SC-19 addressed the need to provide training to municipalities regarding LID and GI that would/could address this. SC-24, SC2-9 also addresses this topic.
111	9/16/2014	Bronx, NY Public Meeting	private stakeholder	Accessibility target - how would town use this plan to get more access points?	Addressed in SC-37. A public access plan would highlight the role of, and need for, coordination with local towns.
112	9/16/2014	Westbury, NY Public Meeting	private stakeholder	Need to add language regarding "General Recreation" (ex. blueways). Possibly add to Public Access to beaches and waterways target	Strategy 3-5a2 now reads "Improve access to Long Island Sound and its embayments, maintain and enhance view corridors and blueways, and enhance waterdependent uses." The ecosystem target was not altered.

113	10/4/2014	Robert Fromer	private stakeholder	<p>I recommend the following:</p> <ol style="list-style-type: none"> 1. Prohibiting smoking at all beaches as a pollution source 2. Creating a construction manual/handbook for recreational piers and docks similar to the handbook from the state of Maine 3. Discouraging and disincentivizing rebuilding of storm ravaged homes. Encouraging rebuilding on inland properties 4. Denying flood insurance to storm ravaged property owners 5. Eliminating the exemption of residential homes from coastal site plan review and the enforcement policies of the Connecticut Coastal Management Act because such properties are not water-dependent uses 	<p>Recommendation one would be at the discretion of state and local parks. The other elements relate to sustainability and resiliency plans; they are implicit in existing IAs; we have added # 2 to SC-30.</p>
114	10/15/2014		CAC	<p>Add or incorporate SC outcomes: Maintain navigable channels in harbors and bays using sustainable practices that include timely dredging and material re-use. Encourage dredge material re-use projects that restore and enhance natural system resiliency.</p>	<p>Added text to SC-33 under strategy 3-4b3; renumbered activities; adjusted the text accordingly.</p>
115	10/15/2014		CAC	<p>Add or incorporate SC Outcome: By 2020, all waterfront communities have developed plans for shoreline resiliency and infrastructure sustainability and resiliency with half in active implementation.</p>	<p>We have an ecosystem indicator and target with similar language: Waterfront communities with resilient shorelines and sustainable, resilient infrastructure: By 2020 all coastal municipalities have developed plans for shoreline resiliency and infrastructure sustainability and resiliency; with all plans fully implemented by 2035.</p>

Add or incorporate SC Top Actions:

(a) By 2020: 20 waterfront communities have evaluated natural and climate-related impacts and developed plans for shoreline and infrastructure sustainability and resiliency, with 10 communities actively implementing them.

(b) By 2018: Identify and design 15 coastal and riverine habitat enhancement/restoration projects that will protect human neighborhoods from flooding, assure clean water and provide wildlife habitats. Examples include: nature-based demonstration projects that protect or restore priority natural shorelines, beach and dune restoration/enhancement, marsh enhancement, migration and restoration, shoreline softening projects, removal of high risk dams, ecological connectivity and flood improvement projects associated with bridges and culverts, and protection, restoration, and enhancements to riverine floodways and floodplains.

(c) By 2018: Secure legislation that supports coastal resilience by requiring consideration of sea level rise in coastal permitting, waste water management and promoting nature-based adaptation.

(d) By 2018: Identify high priority coastal conservation areas around LIS, including both ecological priority and disaster reduction priority areas and implement projects to conserve them.

(e) By 2025: Implement coastal and riverine habitat enhancement/restoration projects to benefit 60 miles of coastal and riverine habitat.

We have a ecosystem indicator and target related to resilient shorelines and sustainable resilient infrastructure. There is an interim target (2020) for all municipalities to develop S/R plans; In a), the CAC suggests only 20; we have incorporated b) and d) into SC-33. Specific legislation (recommendation c) is not proposed as an action, but the CCMP does include strategies and actions to incorporate sea level rise into development and management decisions. Recommendation e) is already part of coastal restoration goals in the HW theme.

I would like to see CFE and LISS send letters of support to DEEP Commissioner Klee requesting creation of a waterfront construction manual

These would be elements of sustainability and, or, resiliency plans; they are implicit in existing IAs; we have added text to SC-30

We need to reach farther up into the watershed - to upper watershed communities and get them involved in addressing water quality problems too. (during webinar)

Inclusion of all watershed communities is incorporated into the plan, for example, *SM-23: Foster involvement of the tributary states in Management Conference activities by maintaining the Five State/EPA TMDL Work Group* and *WW-25: Develop and implement a water quality monitoring strategy for nitrogen in the upper basin states of Massachusetts, Vermont, and New Hampshire.*

116 10/15/2014

CAC

117 10/21/2014 Robert Fromer

private stakeholder

118 10/28/2014 Robert Fromer

private stakeholder

119	11/7/2014	Martha Smith	private stakeholder	<p>The updated CCMP should include emphasis on access to the coast for everyone, regardless of income level. Access to CT's shoreline is already restricted by a high percentage in private ownership. In addition, municipal restrictions prevent out of town visitors to local beach and shoreline parks. Coastal real estate values continue to climb. Beaches and shorelines are becoming narrower, restricting public access even more as high tides comes up to homes and buildings. As costly flood proofing coastal homes per FEMA requirements becomes the norm, it squeezes out the lower income homeowners first. In some cases, home that were originally built as summer bungalows, but are now too expensive to upgrade are sold, and replaced by more expensive homes on stilts. Rising coastal water levels and storms are changing coastlines, but if opportunities are pursued for more public access and less development along the LIS shoreline, this public trust resource would truly be for all the public.</p>	<p>Much of this language was added it to SC-37: <i>Develop a Public Access Plan to increase public access points and the length of shoreline accessible by the public to the Sound and its rivers</i> (new numbering).</p>
120	9/17/2014	Sandy Breslin, New Haven, CT Public Meeting	Audubon NY and CT	<p>Fully support Sound Wide Public Access Plan, but please consider habitat when doing so.</p>	<p>Added language to SC-15 reflecting this; SC-37 has existing language.</p>
121	9/16/2014	Bronx, NY Public Meeting	private stakeholder	<p>Towns are eager for knowledge on how others are going about development and sustainable infrastructures and BMPS on all scales - this gets to Sustainability Award Program and what is in SM desired outcomes</p>	<p>SC-21,SC-24,SC-25 address this in degrees.</p>
122	11/7/2014		NYSDEC	<p>"Following release of this draft plan, the states will estimate the federal and state funds needed over the next 20 years to meet statewide needs, including additional Long Island Sound-specific project needs." -- what does this mean?</p>	<p>A new section "Funding Strategies" is in the final CCMP. This section discusses past investments and ongoing needs to restore Long Island Sound.</p>
123	10/20/2014	Denise Savageau	Greenwich, CT	<p>Need to include USDA NRCS - Regional Conservation Partnership Program to Federal funding programs</p>	<p>Added as an example funding program in <i>Section 5: Funding Strategies</i> in final CCMP. NRCS is also mentioned as a partner in many Implementation Actions detailed in the CCMP supporting documents.</p>
124	11/7/2014		NYSDEC	<p>Strategy 4-1b4: Strengthen monitoring of embayments and near-shore waters, and integrate data and assessments into open water monitoring programs. -- And assessment of embayment conditions</p>	<p>Modified strategy language to clarify.</p>
125	11/7/2014		NYSDEC	<p>Strategy 4-3b1: Establish baselines of historical or prehistorical conditions of ecosystem attributes and magnitudes of change to help provide a basis for setting restoration goals. -- Do we need to be clearer here (ie is this wetland change? Water quality change?</p>	<p>Strategy not changed. It is intended to be general and not specific to one habitat type or to one water quality parameter. In short the strategy calls for understanding what LIS was like historically to better set targets for what it could be in the future.</p>

126	11/7/2014	NYSDEC	SM-1 Identify and communicate high priority science needs relating to the understanding and attainment of management objectives and ecosystem targets. -- See comment in IA doc. Is this a priority? Calls for more funding every two years. Is this something ID'd in GIS assessment as a need. If so how is this prioritized over all other real GIS data base needs. While it is a good idea didn't the book start this and perhaps some of this is something the Science and Technical Advisory Committee can do or does instead of new funding?	This action is not in response to the GIS report. It relates to regular updating of science needs after evaluating and synthesizing ongoing work. It can mostly be accomplished with staff time and with input from the STAC. The IA has been modified somewhat to decrease the frequency of formal updates.
127	11/7/2014	NYSDEC	SM-16 Link water quality models of Long Island Sound to watershed and groundwater models to better elucidate nutrient and water budgets. -- Should be Water quality and load models . A priority re embayment modeling and understanding embayment water quality issues.	The IA, now SM-13, has been modified to read <i>Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watersheds.</i>
128	11/7/2014	NYSDEC	Make SM-19, 40 a priority	SM-19 and SM-40, now SM-16 (Optimize structure and function of the Management Conference with a focus on implementation of the revised CCMP.) and SM-38 (Issue a "report card" on water quality conditions in Long Island Sound.) have been made priorities.
129	11/7/2014	NYSDEC	Make the following priority actions: SM-2, SM-10, SM-13, SM-16, SM-19, SM-40	SM-2 has been combined with SM-1 to read <i>Identify and communicate high-priority science needs relating to the understanding and attainment of management objectives and ecosystem targets, and support research programs to fulfill these needs</i> .SM-10 has been deleted and incorporated into <i>WW-29: Complete LISS Sentinel Monitoring for Climate Change pilot projects and evaluate results to guide strategy development and future implementation</i> .SM-13, now <i>SM-10: Improve the use and utility of Long Island Sound data for GIS applications</i> .has been made a priority. SM-16 now SM-13, has been modified to read <i>Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watersheds</i> , and has been made a priority. For SM-19 and SM-40, see line #129.

130	11/7/2014		NYSDEC	<p>SM-1 ..."The LISS will annually consider elements of the science and monitoring plans that are high priority for funding." -- Weren't science needs solicited as part of the synthesis book at least in general? We have a lot of GIS needs. Perhaps we need to look at GIS needs assessment and figure out priorities from that? This is not a bad action at all but a priority for right now. This is requested to be undertaken every 2 years at another additional cost from our budget?</p>	<p>Science needs were identified in the book, but this task will prioritize them in the context of the updated CCMP. GIS needs can be part of what is identified. Minor changes were made to the IA write-up, including making the update due every five years instead of two.</p>
131	11/7/2014		NYSDEC	<p>SM-16 ..."Eutrophication modeling would benefit from more refined models to estimate coastal runoff loading of nitrogen." -- Include individual embayment loads. This is a priority. Perhaps also the use of individual n load or pathogen models.</p>	<p>The IA, now SM-13, has been modified to read <i>Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watershed</i>. The action has also been made a priority.</p>
132	11/6/2014	Chantal Collier	TNC	<p>Strengthen Strategy 4-2a5 by revising it to: "Complete a bi-state marine spatial plan for LIS, adopted and implemented by both NY and CT, to facilitate compatible uses of the Sound and conservation of its natural resources and habitats." (currently reads: "Through Marine Spatial Planning facilitate the management of multiple human uses of the Sound compatible with the conservation of natural resources and habitats.")</p>	<p>The final language was kept the same. The more general language is appropriate based upon ongoing legislative and policy discussions.</p>
133	11/6/2014	Chantal Collier	TNC	<p>Add the following IA and make it a priority IA: "Characterize, inventory and map natural resources and human uses of LIS and obtain authorization and funding to support completion and implementation of a bi-state marine spatial plan."</p>	<p>The suggested action is covered under strategies 4-1b1 and 4-1b2. These strategies were edited to include "inventory." SM-3, <i>Identify key datasets needed to support coastal and marine spatial planning for Long Island Sound and initiate collection</i>, relating to identifying key datasets for CMSP, was also modified.</p>
134	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Consider adding SM-xxx to read: Increase water quality monitoring efforts for nutrients, bacteria, and dissolved oxygen in the nearshore regions. Couple water quality monitoring with wave and current monitoring to correlate trends.</p>	<p>The need to increase water quality monitoring in nearshore areas is already covered in 4-1b4 and SM-9. The WW theme also has specific strategies and actions relating to increased water quality monitoring.</p>
135	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>SM-14, consider adding the following language: Improve the linkage or nesting of coarse hydrodynamic and eutrophication models to allow site specific application (fine scale models) to nearshore areas where effects of waves, shoreline evolution, eutrophication, and water quality can be integrated. Apply these site scale models in planning of nearshore structures, habitat creation/planning/restoration, and in MS4s, SPDES, shellfish management, fisheries management, and public beach safety.</p>	<p>Detail on nesting of finer scale models added to <i>SM-11: Enhance modeling of eutrophication in Long Island Sound to support nitrogen management and Dissolved Oxygen TMDL implementation</i> in the supplemental document.</p>

136	10/13/2014	STAC and CAC	<p>1) The plan must clearly articulate the essential need for the expansion of a coordinated program of comprehensive observations that are capable of detecting the benefits anticipated as a result of management actions and also the changes due to global climate change. 2) The expansion of a professionally designed and managed citizen science observation program should be an important component of the expanded system. 3) A data system for aggregating, archiving, and distributing the measurements should be part of this system. 4) Adaptive management also requires that a vibrant research program is a critical element of adaptive management so the program can integrate the new knowledge developed by the science community in the coming decade.</p>	<p>The plan as written includes all these points in its objectives, strategies, and actions. 1) See Outcome 4-1, objective a, b. 2) See <i>SM-8: Coordinate and leverage community water quality monitoring programs, enhancing citizen science and the utility and application of data</i>. 3) See <i>SM-5: Develop an integrated Data Management Plan considering local, regional, and national observing initiatives</i> and <i>SM-12: Make publicly available the System-wide Eutrophication Model code and products to enhance transparency and collaboration</i>. 4) See Objective 4-3b and <i>SM-1: Identify and communicate high-priority science needs relating to the understanding and attainment of management objectives and ecosystem targets, and support research programs to fulfill these needs</i>.</p>
137	10/15/2014	CAC	<p>Add or incorporate SM outcome: By 2020, complete a bi-state marine spatial plan for LIS, adopted and implemented by both NY and CT, to facilitate compatible uses of the Sound and conservation of its natural resources and habitats.</p>	<p>Addressed in line 132</p>
138	10/15/2014	CAC	<p>Add or incorporate SM Top Actions: (a) By 2018: Characterize, inventory and map natural resources and human uses of LIS, obtain authorization and funding to support completion and implementation of a bi-state marine spatial plan. (b) By 2016: Issue an economic analysis report on the anticipated LIS regional economic impact expected from meeting the combined goals and outcomes established under this revised CCMP framework, with the economic impacts broken down by analyzing the outcomes listed under each of the 4 themes included in the revised CCMP.</p>	<p>a) See response to line 133. b) See Strategy 4-2b1, <i>SM-25: Conduct primary valuations of the critical ecosystem goods and services supported by Long Island Sound and its coastal habitats</i> and <i>SM-26: Conduct return on investment analysis for Long Island Sound restoration and preservation strategies to inform priority setting for implementation of the CCMP</i>.</p>
139	11/7/2014	NYSDEC	<p>Strategy 4-1b1: Characterize and map open and shallow water habitats to support resource management and marine spatial planning -- do we add wetland mapping here, or does it fit better in HW</p>	<p>Specific strategies and actions for wetland or other coastal habitats are in the HW theme.</p>

140	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	To assist in planning and management of the Sound's shorelines, develop a shoreline database and hydrodynamic model that classifies wave and tidal exposure, shoreline type, geomorphic state, habitat value, and water quality conditions that can be used for all projects in the Sound, helping to plan and manage areas of overlap and complexity.	These tools and data to support them are dispersed among a number of programs and are reflected in a number of Strategies and Actions. Tools to support water quality, habitat management, and resiliency and climate adaptation are highlighted across the CCMP themes.
141	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Riparian Buffer Extent target to indicate whether this is watershed-wide or just within the LIS boundary	Added updated language in the Appendix B Technical Explanation of Ecosystem Targets under Riparian Buffer Extent to clarify that the target is for the CT and NY portions of the watershed.
142	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise Open Space Extent Protected target to add a NY target	New York target added.
143	9/16/2014	Westbury, NY Public Meeting	Citizens Campaign of the Environment	WW targets are more ambiguous than HW targets; these shortened target statements need to contain the specifics because these will be the statements that are the "headlines" of the CCMP... for example with the hypoxia target, add 30% reduction right in the hypoxia target language	Details to the ecosystem targets are provided in Appendix B. The percent reduction necessary to meet the goal will depend on the variability of the data. As a result, a specific reduction percentage was not added to the target.
144	10/20/2014	Denise Savageau	Greenwich, CT	Ecosystem-Level Indicators and Targets: Nitrogen loading:... May want to add in something about source water protection. This will provide for the healthier watershed and engaged upstream stakeholders. FYI LIS watershed is the watershed for many of the large cities in New England including Boston, Springfield, Hartford, New Haven, Bridgeport, and Stamford.	An ecosystem target for source water protection would better be set by source water protection programs than the LISS CCMP.
145	10/20/2014	Denise Savageau	Greenwich, CT	Ecosystem-Level Indicators and Targets: Open Space extent protected: ... why is this limited to CT and not the entire watershed? Need to think landscape scale here. If MA, VT, NH get developed that will have major consequences on LIS. Need to keep these areas rural.	The main supporters of the LISS CCMP are the states of CT and NY. While targets for upper watershed states can be appropriate when focused on downstream pollution, more general open space targets should be set by the affected state and local governments.

146	10/20/2014	Denise Savageau Greenwich, CT	<p>Outcome 1-1 Need to focus on NPS pollution AND not try to use point source programs to achieve results. For example, the MS4 program is using the NPDES permit program to try and solve a NPS pollution problem. This does not fit well into the New England landscape where we do not have "city limits" but rather municipalities are the boundary lines (not unincorporated county (except in very northern rural sections.)). Municipalities are working on land use and LID but forcing the issue the MS4 process is counter-productive to what needs to be achieved. Need to use carrot (319 funding) not the stick (MS4) for great results. MS4 should be very limited to the very urban areas and not based on town population since our towns often encompass large rural areas and urban centers.</p>	<p>The CCMP advocates using a combination of tools and strategies, including 319, MS4, and other SRF programs to assist municipalities in reducing contaminant levels in stormwater systems. Included this language into WW-2 and WW-7.</p>
147	10/20/2014	Denise Savageau Greenwich, CT	<p>Strategy 1-1b2: "Protect healthy watersheds through land protection and retaining green infrastructure" - How? LID? Open space set aside?</p>	<p>The strategy was revised to <i>Protect wetlands, healthy watersheds, riparian buffers, and open land to minimize land disturbance and impervious cover through land protection, sustainable development, and green infrastructure</i>. In addition, <i>WW-14</i> now states <i>Promote establishment and protection of riparian corridors and wetland buffers at the municipal level through development of local ordinances and increased permanent land protection</i>. Details for this action in the supplemental document include training and resources at the municipal level to promote permanent land protection and develop local ordinances that will establish riparian and buffer zone regulations.</p>
148	10/20/2014	Denise Savageau Greenwich, CT	<p>Objective 1-1c: "To restore and protect the hydrologic and ecological functions of the LIS watershed to protect groundwater and reduce..." Do we need to talk about healthy forests here?</p>	<p>Healthy forests are more appropriately covered in the open space and habitat restoration targets in the Habitats and Wildlife theme.</p>

149	10/20/2014	Denise Savageau	Greenwich, CT		Need to develop source water protection program for LIS watershed.	The states have existing, well-developed source water protection programs to address drinking water sources. For information on Connecticut's programs, please visit www.ct.gov/deep/aquiferprotection and http://www.ct.gov/dph/cwp/view.asp?a=3139&q=387338 and for New York's program, please visit https://www.health.ny.gov/environmental/water/drinking/ . The Connecticut Department of Public Health has its Source Water Protection Unit which oversees the statewide "Strategic Plan for the Implementation of Drinking Water Source Protection" and CTDEEP has a well established aquifer protection program and will continue to implement its goals. See http://www.ct.gov/deep/cwp/view.asp?a=2685&q=322252&deepNav_GID=1654 and http://www.ct.gov/dph/lib/dph/drinking_water/pdf/CT_SWP_factsheet.pdf
150	11/5/2014	Ray Tartaglione	Heal the Harbor (White Plains, NY)		Requests the CCMP include investigation of sewage entering LIS via Hen Island in Rye, NY. Hen Island is a residential community located in Milton Harbor consisting of 34 seasonal homes with no effective or responsible sewage treatment/management or potable water supply. Many of the sewage pits are located just feet from the shoreline of the Long Island Sound. Domestic water is collected via cistern storage. Remediation of these issue will surely reduce nitrogen and pathogens entering our waterways, will increase habitat protection and restoration for fish, and other wildlife in Milton Harbor as well as protect the health and safety of the public not only on Hen Island but also on the mainland. www.henislandthemovie.com	The CCMP does not address site-specific issues. Existing programs and policies need to address specific place-based issues.
151	9/16/2014	Joel Ziev, Westbury, NY Public Meeting	private stakehold		Sewage treatment systems on Long Island have evolved over the last 100 years, and hit a wall, and a significant # of houses (approx. 100) on coast not tied into system... how can we help tie them into that system? Is this something for the CCMP?	New technologies and policies are needed. See <i>WW-10: Develop improved policies for use and performance of decentralized and on-site wastewater treatment systems</i> and <i>WW-11: Improve understanding, management, and design of denitrifying decentralized and residential, on-site wastewater treatment systems</i> .
152	11/7/2014	Jane Jackson	North Shore Land Alliance		Make IA WW-19 and WW-20 priority actions and add a period to the end of IA WW-39	These actions were combined into a priority action <i>WW-14: Promote establishment and protection of riparian corridors and wetland buffers at the municipal level through development of local ordinances and increased permanent land protection</i> .

153	11/7/2014	NYSDEC	Add WW-8,9,15,19,20, 39 as priority actions	<p>WW-8 was incorporated into priority action <i>SC-30: Implement standards, best practices, and educational materials for Green Infrastructure/Low Impact Development planning and implementation</i>. WW-9 was incorporated into <i>WW-1: Evaluate the impact of increasing human population, climate change, and land use trends in the Long Island Sound watershed to determine nutrient and contaminant stressors on sewage loads from Wastewater Treatment Facilities (WWTFs)/Combined Sewer Overflows (CSOs) and decentralized/on-site wastewater treatment systems (OSWTS)</i>. WW-15 became priority action <i>WW-11: Improve understanding, management, and design of denitrifying decentralized and residential, on-site wastewater treatment systems</i>. WW-19 and WW-20 became priority action <i>WW-14: Promote establishment and protection of riparian corridors and wetland buffers at the municipal level through development of local ordinances and increased permanent land protection</i>. WW-39 became priority action <i>WW-31: Assess sources of nutrient and pathogen contamination to Long Island Sound embayments</i>.</p>
154	11/7/2014	NYSDEC	Do we need an IA regarding supporting assessment of N impact to habitats ie wetlands. Here or in science management or habitat?	<p>This is handled under <i>2-4a4, HW-26: Assess locations of tidal marsh loss and the parameters impacting tidal marshes through research and monitoring, and use this information to create a suitability model to determine sites for restoration</i>. LISS has funded this work in the past and the topic was included in the November 22-23, 2014 tidal wetlands loss workshop.</p>
155	11/7/2014	NYSDEC	<p>WW-9: Conduct a population and land use change study in the Long Island Sound upper and lower watersheds to determine nutrient load stressors as a result of new development and redeveloped areas. -- Perhaps this needs to be done on a periodic basis to detect appropriate changes and inform N loads done in embayments . UCONN Clear did this already.</p>	<p>Agreed. Incorporated this text into <i>WW-1</i> to make one joint action to conduct periodic monitoring of population and land use increases and their impacts on contaminant load.</p>

156	11/7/2014		NYSDEC	<p>WW-14: Funding Sources: A combination of state and federal grants and loans primarily funded through each state's' respective SRF loan and grant programs and through EPA Grants. Possible Long Island Sound Futures Fund, other local grants or private funds could be used for studies or pilot projects. -- Suffolk county is doing various studies of alternative septic systems to reduce N so add that as an aspect of this action. I am not so jazzed about efficacy of training for muni officials about septic systems...don't think anything is ever improved regarding existing systems after training so there is no on-the-ground improvement.</p>	<p>Some of this information is included in the supplemental document details to the action, now WW-10. No change in action title.</p>
157	11/7/2014		NYSDEC	<p>WW-27 change part of description to read "Testing and permitting currently is a very lengthy process.."</p>	<p>This IA is now numbered WW-22 and we have incorporated the suggested language in the supplemental document details.</p>
158	9/17/2014	Roger Reynolds, New Haven, CT Public Meeting	private stakeholder	<p>IAs about WWTP and CSOs sound too general and not forceful enough - need to be more specific</p>	<p>The CCMP is a general framework; details such as specific load limits are developed at the TMDL level.</p>
159	11/6/2014	Chantal Collier	TNC	<p>Strengthen Outcome 1-1: by including the following measurable objectives and including them as priority outcomes: a. "By 2020, a new federally- and state-recognized plan for reducing nitrogen in LIS will be adopted which addresses multiple sources of nitrogen, relative contributions, effective strategies for reduction and consideration of biological response to reductions." b. By 2035, water quality is improved by reducing nitrogen loading to LIS including its embayments, helping sustain productive habitats, support marine and estuarine species, and protect the multiple uses and values the Sound.</p>	<p>A) This comment is addressed in <i>Strategy 1-1a3: Enhance implementation of the existing 2000 Dissolved Oxygen Total Maximum Daily Load throughout the watershed; and adapt and revise it based on monitoring, modeling, research, and how climate change may affect attainment of water quality standards in the future.</i> WW-6: Enhance implementation of the 2000 Dissolved Oxygen TMDL and evaluate revision of the TMDL and allocations as needed to attain water quality standards .B) The CCMP already includes an ecosystem target to reduce nitrogen loadings to attain the current TMDL. Any new reduction targets would be incorporated into updates to the CCMP.</p>

160	11/6/2014	Chantal Collier	TNC	<p>Add the following measurable IAs and include them in priority IA:</p> <p>a. Sources and relative contributions of nitrogen are assessed for all coastal watersheds.</p> <p>b. Federal, state, and all other interested parties work together to address the status of nitrogen loading and hypoxia in LIS and create an ambitious, effective plan to restore conditions that sustain marine life, enable ecosystem recovery, and support coastal resilience throughout the Sound.</p> <p>c. By 2018, policies, practices and technologies that enhance resilience to SLR and storms, and accelerate nitrogen reduction efficiency of waste treatment systems including septic, waste water treatment facilities and stormwater infrastructure are identified and enabled.</p>	<p>Resilience to SLR and storms is addressed in the Sound Communities and Science and Management themes. Comment a) addressed in <i>SM-13: Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watersheds</i>, which was edited to clarify objective of assessing all coastal watersheds. Comment b) addressed in <i>WW-6: Enhance implementation of the 2000 Dissolved Oxygen TMDL and evaluate revision of the TMDL and allocations as needed to attain water quality standards</i>. Comment c) the impact of climate change on water infrastructure is addressed in <i>WW-12: Improve efficiency and resiliency of existing/new waste treatment systems including septic, WWTF, and stormwater infrastructure to accommodate sea level rise</i>.</p>
161	9/17/2014	Tony Piazza, New Haven, CT Public Meeting	private stakeholder	<p>Other point sources, ex. road salt use need to be looked into</p>	<p>Road salt is a non point source contaminant issue in the freshwater portion of the LIS watershed. We are not addressing it as a concern to the brackish and saltwater portions of the system.</p>
162	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Water Clarity: Can this have a target acreage increase and geographical focus area, because in current and near future conditions, only certain parts of the Sound can or are close to being able to support eelgrass revival.</p>	<p>It is difficult to estimate a target for area of improved water clarity. But we are setting a target of restoring and maintaining an additional 2000 acres of eelgrass by 2035, in the Technical Explanation of Ecosystem Targets (Appendix B). The recently issues Long Island Sound Report Card has grades for five basins, covering the length of LIS. Improvement would be assessed for each basin overall as opposed to areas within defined water clarity ranges.</p>
163	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Riparian Buffer Extent: Challenging in NYC due to urban spatial constraints. Hybrid natural/man made buffers or technologies that provide buffering water quality benefits may need to be employed.</p>	<p>Agreed that green infrastructure will need to be used in for urban areas to mimic the benefits of natural riparian buffers.</p>
164	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Open Space Extent Protected: Targets for NY?</p>	<p>NY open space target has been added.</p>
165	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>Many of the strategies 1-1xx seem to overlap and may be condensed?</p>	<p>Strategies and actions were reviewed and combined where appropriate.</p>
166	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	<p>WW-8: This may be redundant with NYSDEC stormwater manual (or CT equivalent). May make sense to employ a LIS geographic supplement to the stormwater manuals as opposed to developing a new, separate document?</p>	<p>WW-8 was incorporated into priority action <i>SC-30: Implement standards, best practices, and educational materials for Green Infrastructure/Low Impact Development planning and implementation</i> Existing guidance and manuals would be a starting point for any LIS-specific assistance.</p>

167	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	WW-12, supplement current language with: Employ more active and routine investigations for identifying and eliminating dry weather discharges from combined sewers and sanitary sources.	Agreed. Incorporated this language into the project description of WW-5.
168	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Consider making WW-22 a priority item. Can WW-22 be supplemented to read "Develop water quality and shoreline evolution monitoring programs associated with coastal habitat restoration projects in order to quantify nutrient, bacteria, and turbidity benefits."	Incorporated the suggested language into the IA now titled <i>WW-27: Develop water quality monitoring programs associated with coastal habitat restoration projects</i> . It is not listed among the top 12 priorities.
169	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	WW-25, supplement current language with: Develop a predictive coupled nutrient- hydrodynamic tool that is calibrated/verified by monitoring data to help prevent eutrophication and HAB outbreaks.	Now WW-32, the action is about monitoring and tracking, not modeling. However, work to model HAB outbreaks is already underway through LISS funding.
170	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Consider adding WW-26 and WW-27 to priority list.	These actions have been revised as WW-20 and WW-21. They have not been listed as among the 12 priority actions.
171	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	WW-23, supplement current language with: Perform hydrodynamic modeling analysis of spill transport during storm surge events to further prioritize critical facilities where extensive water quality damage to sensitive habitats would occur, if storm induced spills occur.	This IA has been moved to the Sustainable and Resilient Communities section and is now <i>SC-29: Identify and recommend removal and, or, protection of sensitive infrastructure in the coastal zone (e.g., oil tanks, pump, power stations, etc.) and work to prevent future siting of such infrastructure in vulnerable coastal floodplains</i> .
172	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	WW-39, supplement current language with: Assess sources of nutrient and pathogen contamination to LIS embayments through monitoring and calibrated/verified coupled stormwater/hydrodynamic/groundwater models.	WW-39 became priority action <i>WW-31: Assess sources of nutrient and pathogen contamination to Long Island Sound embayments</i> .
173	11/7/2014	Vince DeCapio Msc, P.E.	Water and Coastal Resources Engineering	Can these numerical ecosystem-indications and targets be increased or are they currently maximized by economics, historical rates of implementation, or feasible sites for implementation?	There is a tension between what is achievable and what is possible to drive innovation. We have tried to move closer to "possible" category in our ecosystem indicators and targets. We have two types of targets (1) numeric, e.g, hypoxia, sediment quality) and (2) trajectory, e.g., water clarity, shellfish harvest)
174	10/20/2014	Heidi Wallace	Westbrook, CT	There appears a growing problem with boats dumping their raw sewage into LIS that needs to be addressed a little more aggressively.	This is illegal and has been for some time. What is needed is education, compliance assistance, and enforcement. General education, building awareness and support among the public, is addressed in the SC theme.
175	9/16/2014	Bronx, NY Public Meeting	private stakeholder	More work needs to be done in local embayments	There are numerous strategies and actions with a focus on local embayments, including priority action <i>WW-31: Assess sources of nutrient and pathogen contamination to Long Island Sound embayments</i> .

176	9/16/2014	Bronx, NY Public Meeting	private stakeholder	<p>WW needs to put numbers on targets, also should expand why we are trying to achieve some of these targets, and establish biological indicators for each target OR trends may look better than numerical targets</p>	<p>This is accomplished by revisions to add detail to targets as provided in Appendix B.</p>
177	9/16/2014	Bronx, NY Public Meeting	private stakeholder	<p>Does the plan intersect with 303(d) list? of which many embayments in LIS are on. And many towns don't know their embayments are on the list so they aren't monitoring -- need to do embayment monitoring</p> <p>- possible measurable target - reduce # of LIS embayments/ waterbodies on 303(d) list and push for TMDLs in these areas</p>	<p>Priorities for addressing impairments to embayments will be set considering 303(d) listings. See line 175</p>
178	9/16/2014	Westbury, NY Public Meeting	private stakeholder	<p>Need to focus on non-point source controls, need to understand relative contribution percentages of nitrogen to the Sound before we determine where to focus efforts.</p>	<p>The Long Island Sound TMDL for nitrogen identifies source loads. <i>SM-13: Link water quality models of Long Island Sound to watershed and groundwater pollutant loading models to better elucidate sources and relative contributions of nitrogen, including all coastal watersheds</i> is tailored to improve those estimates.</p>
179	9/17/2014	New Haven, CT Public Meeting	private stakeholder	<p>Hypoxia target needs clearer, more public friendly explanation, if possible</p>	<p>Appendix B of the CCMP deals with the technical specifics of the targets. While the text has been edited to be "public friendly" as possible, the CCMP Public Summary translates the target into plain language.</p>
180	9/17/2014	New Haven, CT Public Meeting	CT Fund for the Environment	<p>CT Fund for the Environment asked "Why isn't there more talk about WQ standards and strategies to reach them? And a new LIS TMDL? - explanation as to "why not" needs to be addressed in the Plan.</p> <p>Also, maybe looking just for an improving trend in WQ should be the target, because of so much variability, like the hypoxia target</p>	<p>The ecosystem target (Measurably reduce the area of hypoxia in Long Island Sound from pre-2000 Dissolved Oxygen TMDL averages to increase attainment of water quality standards for dissolved oxygen by 2035, as measured by the five-year running average size of the zone.) was modified to make clear the need to attain water quality standards. <i>WW-6: Enhance implementation of the 2000 Dissolved Oxygen TMDL and evaluate revision of the TMDL and allocations as needed to attain water quality standards</i>, addresses the need to implement, evaluate, and revise the TMDL as needed to attain water quality standards.</p>
181	10/15/2014		CAC	<p>WW Overall outcomes: Focus existing state and EPA Clean Water Act implementation tools, such as MS4 permit conditions, SSO and CSO enforcement strategies, state and federal water infrastructure investments, water quality monitoring and associated adaptive management to achieve the following outcomes and top actions.</p>	<p>The CCMP does emphasize application of core water quality program tools to address pollution impairments.</p>

Add WW outcome: Adopt low impact development standards for new development and green infrastructure retrofits within the New York and Connecticut Watersheds.

Add related top actions: (a) By 2018: Assure that any new development or major redevelopment is designed so that, at a minimum, the first 2" of precipitation are captured and infiltrated on site.

(b) By 2035: Retrofit, with green infrastructure techniques, a total of 20% of the impervious surfaces of public streets, driveways, parking lots and rooftops within the NY and CT portions of the watershed to capture and infiltrate the first 1" of rain to improve water quality and reduce increased flooding risks associated with climate change.

We added IAs to accomplish a) (See *WW-15: Support implementation of stormwater permit guidance requiring all new development and substantial redevelopment to capture and infiltrate runoff from the 90th percentile storm, (generally a 0.8–1.3 inch storm)* and b) (See ecosystem target *Impervious Cover: Through green infrastructure, low impact development, and stormwater disconnections, decrease by 10 percent the area of effective impervious cover in the Connecticut and New York portions of the watershed by 2035 relative to a 2010 baseline.*

Add WW outcome: Substantially reduce the area and duration of hypoxia in the Sound compared to the weighted average of area and duration experienced over the past five calendar years (2008-2013). Establish and implement aggressive and practicable nitrogen and reduction targets beyond the existing 58.5% TMDL. The aggressive additional reduction targets are necessary in light of climate related trends including changes in temp., river flow, and wind direction and velocity.

Add related top actions: (a) By 2016: Establish a new federal and state-recognized enforceable plan for achieving the max. practicable nitrogen reductions within the watershed. The plan must target multiple sources of nitrogen, relative contributions, effective strategies for reduction and consideration of biological response to reductions. It should also include nitrogen credits for natural system bioextraction, including shellfish aquaculture and harvesting, shellfish restoration, algae aquaculture, and marsh restoration and enhancement projects designed to adapt to anticipated mid-range sea level rise.

(b) By 2018: Identify policies, practices, and technologies to enhance resiliency to SLR and storms, and accelerate nitrogen reduction efficiency of waste water treatment systems including septic, waste water treatment facilities and stormwater infrastructure.

The recommended text is generally incorporated as an ecosystem target, with strategies and actions to support it. Comment a) is addressed in *Strategy 1-1a3: Enhance implementation of the existing 2000 Dissolved Oxygen Total Maximum Daily Load throughout the watershed; and adapt and revise it based on monitoring, modeling, research, and how climate change may affect attainment of water quality standards in the future, WW-6: Enhance implementation of the 2000 Dissolved Oxygen TMDL and evaluate revision of the TMDL and allocations as needed to attain water quality standards.* The LISS partners (CT, NY, EPA) will continue to work under the current TMDL, which has provisions for updates and revisions. We will continue to implement the current TMDL, which is a federally recognized plan, and are on track to meet the nutrient reduction goals. The opportunity exists under the current TMDL provisions, to adopt additional reduction goals. Comment b) on the impact of climate change on water infrastructure is addressed in *WW-12: Improve efficiency and resiliency of existing/new waste treatment systems including septic, WWTF, and stormwater infrastructure to accommodate sea level rise.*

182 10/15/2014

CAC

183 10/15/2014

CAC

184	10/15/2014	CAC	<p>Add WW outcome: Reduce beach closures by 50% by decreasing pathogen and bacteria flows and improved beach management (over the rolling average of closures for the past five years).</p> <p>Add related top actions: (a) Reduce pathogen flows by at least 50% from sewage pipe related leaks (SSOs, CSOs, illicit stormwater discharges); septic and cesspool failures, and stormwater sources; with the identification of sources enhanced by DNA-based pathogen monitoring techniques.</p> <p>(b) Improve beach management through improved real-time monitoring that combines enhanced DNA-based sampling, and more accurate and up to date modeling. Provide support for on-going pathogen monitoring activities at the local harbor and embayment level.</p> <p>(c) Reduce floatable debris through shoreline clean-ups, upstream catch basins, and policies that encourage the reduction of throwaway plastics.</p>	<p>The ecosystem target relating to beach closures was modified to read <i>Public Beach Closures: Reduce by 50 percent the number of beaches reporting at least one closure day or the total number of beach-day closures per monitored beach due to water quality impairments by 2035, compared to a five-year rolling average from 2014.</i> Regarding comment a), there is not good data on current "pathogen flows." Therefore, a reduction target cannot be quantified. <i>WW-19: Encourage state and local health departments to adopt emerging rapid bacterial detection technologies that would allow shorter duration administrative beach/shellfish closings than those based on rainfall only</i> has been modified to address comment b). <i>WW-17: Develop a Long Island Sound-specific marine debris reduction plan and implement actions to support trash-free waters</i> addresses comment c).</p>	
185	11/7/2014	Kris Lambert	<p>Friends of the Oswegatchie Hills Nature Preserve</p>	<p>Suggest the addition of another, specific action: "to acquire 236 acres of land located on the Niantic River and currently owned by Landmark Development." The purchase of this land will preserve what is probably the last continuous, unprotected mile of saltwater frontage in CT. Acquisition of this acreage would also stop a proposed development of 1,720 residential units and allow the Oswegatchie Hills Nature Preserve to be expanded to almost 700m acres.</p>	<p>This is addressed an action under 2-1b2 and 2-1b3 <i>HW-10: Protect high-priority conservation land from development through property acquisition and create a registry of protected conservation land in Connecticut and New York, which encompasses both existing protected properties and future acquisitions.</i> the purpose of this action is to protect high priority land from development. Specific parcels are not identified in the CCMP.</p>
186	11/7/2014	Vjecko Matic	<p>NYC Parks</p>	<p>Integrate the 'long term' opportunities from the tables (particularly section 1 - habitat restoration and section 2 - stormwater management) into the comprehensive restoration plan for LIS. (See document on Google Drive in the Sept-Nov Public Comments subdirectory "NYCDPR Alley Creek watershed Plan Draft - implementation tables-1.pdf"</p>	<p>This is addressed under strategies 2-1b1 and 2-1b2 and actions HW-8, 9, 10, whose purpose is to assess, prioritize and protect important habitat and other land from development.</p>
187	11/7/2014	<p>Vince DeCapio Msc, P.E.</p>	<p>Water and Coastal Resources Engineering</p>	<p>Consider adding the development of SLR hydrodynamic models of the Sound's shorelines that evaluate the ability of existing salt marshes to keep up with (not drown) increasing water levels and wave attack.</p>	<p>There already exists the SLAM model developed by NOAA and other models. <i>HW-26: Assess locations of tidal marsh loss and the parameters impacting tidal marshes through research and monitoring, and use this information to create a suitability model to determine sites for restoration</i> addresses the desired outcome of efforts.</p>

188	11/7/2014	Sandy Breslin	Audubon NY and CT	Revise WW GOAL - Attain water quality objectives by reducing contaminant and nutrient loads from the land and the waters impacting LIS. "Attaining water quality objectives" should be revised to reflect the actual objective: Improve water quality	The goal was modified to <i>Improve water quality by reducing contaminant and nutrient loads from the land and the waters impacting Long Island Sound.</i>
189	10/20/2014	Denise Savageau	Greenwich, CT	Controlling nutrient pollution will require the involvement of the states and communities in the entire watershed, not just in CT and NY. This is very important. And needs to be incorporated throughout the document.	Agreed. See line 118.
190	10/13/2014		STAC and CAC	The strategies that are adopted to conserve and manage Long Island Sound should also enhance the sustainability of the global environment. A goal to monitor and reduce the use of electric power generated from fossil fuels in the management of water treatment plant discharges should be established. Further, fresh water is also likely to become a limited resource. Diversions modify natural ecosystems in the source regions and the discharge areas and consideration of approaches to establish the extent of the impacts should be included in the CCMP.	These types of strategies are part of the sustainability planning and implementation outlined in the SC theme. These plans will likely include performance metrics that may include alternate sources of energy. No additional changes to the CCMP needed
191	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Should have incentives for clean and green marinas	A Clean Marina program already exists through CTDEEP and NY Sea Grant
192	10/27/2014	Old Saybrook Public Meeting	private stakeholder	CCMP should point out what individuals can do, not just larger organizations and agencies. And also CCMP should work on the public perception of LIS and the general public's understanding of the watershed concept and connectivity to LIS.	Within the SC theme, there are numerous strategies (3-1b1, 3-1c1, 3-1c2) and actions (i.e., SC-6, 9, 10, etc.) with a focus on community education and involvement
193	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Educate public that it is illegal for boats to discharge into all LIS, but there are free, available pump-out stations (but there need to be more!) - public education is key; but problem is how to police illegal discharges, it is an unfunded mandate and puts a hardship on towns	See response to line 174.
194	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need to focus on getting baseline figures for all of the Sound's natural resources to be able to prioritize decisions - ex. lobster moratoriums	See HW-22: <i>Collect data on targeted habitat types to assist with development of habitat quality metrics and assessment methodology and SM-35: Refine the ecosystem metrics and targets based on the underlying science of the Long Island Sound ecosystem to clearly identify the characteristics of a "restored" Long Island Sound.</i>

195	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need more emphasis on management of species, not just habitats. Also people and animal interaction. There is a lack of info about habitats; we don't know what parts of the Sound are important for which species. Don't know enough about connections between habitats and species.	There are many actions for interactions between habitats and species. However, as stated in <i>HW-19: Update and implement Connecticut and New York State Wildlife Action Plans, and continue to update or draft new site-specific management plans as needed</i> , wildlife management programs are the primary planners and implementors of species management.
196	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need to formalize recommendations for Trust species in LIS	There are strategies and actions that address trust species. For example, <i>HW-17: Reduce and manage threats to populations of targeted listed species</i> . Wildlife management programs have primary responsibility for formal recommendations regarding Trust Species.
197	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need a long term picture of LIS	This is implicit in the vision of LIS as articulated in the CCMP. Also see <i>SM-35: Refine the ecosystem metrics and targets based on the underlying science of the Long Island Sound ecosystem to clearly identify the characteristics of a "restored" Long Island Sound</i> .
198	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Capacity building/funding/collaboration need for land/open space protection organizations. Many can't maintain lands in perpetuity. Need funding assistance and acknowledgement.	While partly addressed in <i>SC-10: Provide technical and grant assistance to local volunteer organizations working towards the ecological restoration of the Sound</i> , funding will remain an ongoing issue. <i>SM-28: Research and develop innovative, locally appropriate funding mechanisms to provide sustained, reliable sources of investment capital to restore and protect ecosystem services</i> and <i>SM-29: Coordinate and target funding for implementation of protection and restoration, science, and education and involvement projects target funding</i> .
199	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Identify governance impediments, in particular dealing with living shorelines. Chesapeake example with oyster reefs. In LIS there are still issues that prevent oyster restoration. The advantages of reefs mitigate other uses of shoreline. CAC would like a demo reef project.	Implementation actions HW-11 and HW-12 were revised to include suggested language in the supplemental document.
200	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Needs to be a focus on education of general public. People don't really understand watersheds. "I don't live on the beach." And don't understand how they fit into the bigger picture and contribute to the larger issue. Also, people don't understand the impacts of fertilizing lawns - website is not enough - need to be part of a larger study. Needs to be local outreach, local champions. Community-based	Many specific implementation actions were developed in the 'Sustainable and Resilient Communities' section to address education of general public. For example, see actions under <i>Strategy 3-1b1: Provide information products that educate communities about the health of Long Island Sound and about the collaborative efforts to restore and protect the Sound</i> .

201	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need to address how municipalities can incorporate the CCMP at the town-level and how to take it back to their local commissions.	Many specific implementation actions were developed in the 'Sustainable and Resilient Communities' section to address engagement with municipalities. For example, see the strategies and actions under <i>Objective 3-3a: To ensure that policy makers, environmental professionals, health professionals, and other stakeholders have the best available information in order to make decisions that will improve the management of Long Island Sound.</i>
202	10/27/2014	Old Saybrook Public Meeting	private stakeholder	Need to explain to people how they are stakeholders in LIS. Like to see this as a top action.	Many specific implementation actions were developed in the 'Sustainable and Resilient Communities' section to address stakeholder engagement. For example, see actions under <i>Strategy 3-1c2: Encourage residents, both homeowners and renters, to engage in environmentally-friendly practices around their homes and communities.</i>
203	11/6/2014	New Rochelle Public Meeting	private stakeholder	There needs to be something forceful and aggressive to hold municipalities accountable. What's the mechanism to force participation and cooperation. Need an overarching organization to help towns facing development pressures.	The CCMP is a plan that will facilitate cooperation at multiple jurisdictional scales; the plan has no enforcement mechanism and instead relies on existing mechanisms (CAA, CWA, CZMA, ESA, etc.) to encourage participation, cooperation, engagement, and enforcement.
204	11/6/2014	New Rochelle Public Meeting	private stakeholder	Concerned about the lack of specifics for actions and targets in the updated CCMP. There needs to be specific targets for nitrogen, beach closures, etc. This will be helpful in holding municipalities accountable.	The final CCMP includes 20 quantifiable ecosystem targets, a combination of numeric targets and trajectory-based targets, that will be used to assess overall ecosystem response to actions.
205	11/6/2014	New Rochelle Public Meeting	private stakeholder	Would like the CCMP to have more opportunities to do habitat restoration.	The 'Thriving Habitats and Abundant Wildlife' section has been revised to include actions and targets for restoration. Public involvement in restoration is highlighted in <i>HW-21: Design, develop, and promote coupled habitat restoration and monitoring projects that incorporate meaningful citizen science, engagement, and participation.</i>
206	11/6/2014	New Rochelle Public Meeting	private stakeholder	CCMP should have a push for a new federal target for the Nitrogen TMDL.	See response to line 180.
207	11/6/2014	New Rochelle Public Meeting	private stakeholder	CCMP or a supplement for the CCMP should have a project list with corresponding price tags. It will help get funding for each project if there's a project list.	The final CCMP includes <i>Section 5: Funding Strategies</i> , which identifies overall implementation funding needs. Appendix D also lists the top five habitat and riverine migratory corridor restoration projects and costs.

208	11/6/2014	New Rochelle Public Meeting	private stakeholder	Developers should help pay for water quality improvements, especially in municipalities where the waster water treatment infrastructure is aging or cannot handle the increased use	Land development and redevelopment provides opportunitites for green infrastructure, low impact development, sustainability, and resiliency. These concepts are intrinsic to the final CCMP. See WW-2 detail in supplemental document for example of partnering with the private sector.
209	11/6/2014	New Rochelle Public Meeting	private stakeholder	Standards need to be set for Green Infrastructure projects. This will be helpful for new development projects (e.g., they have to capture 2" of rain)	This is addressed in sustainability plan development and implementation. Also, see response to line 182.
210	11/6/2014	New Rochelle Public Meeting	private stakeholder	Need to maintain a sustainable transit system, to reduce the number of vehicles in the immediate LIS watershed.	This topic would be part of in sustainability plans particularly under <i>Objective 3-4a: To encourage and facilitate the development of regional, state, and local sustainability, mitigation, and resiliency plans and integrate them into community comprehensive plans.</i>
211	11/6/2014	New Rochelle Public Meeting	private stakeholder	Organic Landscaping informational materials and courses for professional landscapers need to be offered in Spanish.	Added language as suggested. See <i>Strategy 3-1a3: Connect/reconnect urban populations, including underserved and non-English language communities, to the Sound, SC-8: Raise awareness through various media formats about the Sound's water quality conditions that could impact human health.</i>
212	11/12/2014	Rob Adler	EPA Region 1	WW-14: incorporate language into Project Description/Background: "Utilizing existing EPA guidance documents, the two state Health agencies and county/local health departments will need to develop authorities and programs, plus needed annual funding, to oversee and implement regulations for conventional systems and nitrogen reducing decentralized treatment plants and on-site septic systems.	This Implementation action has been renumbered (WW-10) and the project description in the supporting document revised as recommended.
213	11/12/2014	Rob Adler	EPA Region 1	WW-14: -- There is no federal EPA funding to CT DOH, and very limited SRF funding, to manage residential systems up to 5,000 gpd, nor supporting CT DOH in developing and promulgating regulations that allow use of nitrogen reducing onsite systems in coastal LIS. Appropriate funding is needed to develop needed regulations for nutrient reducing onsite systems.	Agreed, the implementation action is limited to addressing feasibility and providing recommendations.

214	11/12/2014	Rob Adler	EPA Region 1	<p>WW-14 NOTES -- Similarly in CT, there are split authorities for wastewater management, with DOH and local health departments regulating systems up to 5,000 gpd and CT DEEP regulating those over 5,000 gpd. The DOH therefore regulates conventional onsite residential septic systems and though having legislative authority to oversee use of N reducing onsite Innovative and Alternative (I/A) systems, the DOH needs to promulgate regulations to develop a program to manage them. With limited resources, however, DOH is constrained in issuing regulations, which hampers state and local efforts to reduce coastal N, and freshwater P contamination.</p> <p>Suffolk Co. is assertively moving forward to require use of N reducing I/A onsite technologies to stem N contamination of coastal environments. In CT, CT DOH does not receive federal grants, like Section 319 Nonpoint Source grants for onsite wastewater treatment.</p>	<p>Comments noted. This background information frames the challenges to making meaningful progress and highlights what needs to be addressed in the recommended actions (e.g. WW-10).</p>
215	11/12/2014	Rob Adler	EPA Region 1	<p>WW-15 incorporate into project description/background: "The technology exists to remove significant amounts of N from these sources, but it is still expensive, rarely required by law, and in some cases, still under development."</p>	<p>Added language as suggested to renumbered action WW-11 in supplemental document.</p>
216	11/12/2014	Rob Adler	EPA Region 1	<p>WW-15 incorporate into project description/background: "Suffolk County Department of Health is examining current options to implement oversight programs and to investigate Innovative and Alternative nitrogen reducing technologies. Further funding support for CT DOH appears needed to develop necessary regulations and programs to incorporate the use of I/A nitrogen reducing systems for the coastal preservation and restoration. Efforts for quantifying the amount of nitrogen needed for coastal water quality restoration, and protection, is an important element in identifying the type of technologies suitable for treatment. There is a need for onsite technology and land use training in the next 1-year to 5-year time frame.</p>	<p>Comments noted. While too detailed to add to the description of the renumbered WW-11, this background information frames the challenges to making meaningful progress and highlights what needs to be addressed in the recommended actions (e.g. WW-10, WW-11).</p>
217	11/12/2014	Rob Adler	EPA Region 1	<p>WW-15: see comment about funding sources from WW-14</p>	<p>Added language as suggested to renumbered action WW-11 in supplemental document.</p>

218	11/12/2014	Rob Adler	EPA Region 1	<p>WW-15 Expected timeframe comment: 1-year to 5-year onsite I/A technology training and DOH regulation development. Implementation would be 'ongoing.' Studies on water quality for nitrogen reductions should be initiated to occur strategically for implementing nitrogen reducing technologies. To do this right? would probably require a comprehensive study [of what?] of 2 years on the immediate term, followed by legislation to phase in new technology [as in WW-14, DOH has authority but needs to develop regulations to begin use of these technologies. Performance of several technologies are fairly well known and new testing protocols are being discussed for developing performance data to speed up technology approvals] over the next 20 or so years. [Yes, to get old systems out of the ground and new nitrogen reducing ones in will be ongoing for many years.]</p>	Added language as suggested to renumbered action WW-11 in supplemental document.
219	11/12/2014	Rob Adler	EPA Region 1	<p>Useful info for WW-17. Reference: Cape Cod Commission, Draft 208 Plan Update, Aug. 2014, currently under review.</p> <p>Here are a few activities from the following table, 1st column.</p> <p>Also, below, is a table from the same document (a 'pdf' image) Two systems to note: 1. the conventional systems ('Title 5' septic tank and drainfield onsite system), and 2. the nitrogen reducing types of systems (referred to as 'I/A Title 5' systems).It identifies some onsite options and treatment technologies, risks and some solutions related to a couple in ground onsite systems and one's like composting toilets, urine diversion toilets, etc. Not totally comprehensive, but a few ideas.</p>	Useful information to frame the discussion, but too detailed to incorporate at this level document.
220	11/12/2014	Rob Adler	EPA Region 1	<p>WW- 17: Cooperators and Partners The state agencies of Connecticut and New York – Suffolk County and Connecticut their DEEP and DOH and its respective state municipalities' health departments.</p>	Useful information to frame the discussion, but too detailed to incorporate at this level document.
221	11/12/2014	Rob Adler	EPA Region 1	<p>Make the following actions priorities: WW-4, WW-5, WW-6 (enhanced to include TMDL workgroup), WW-7, WW-10, WW-14 (enhanced to include innovative technologies) -- based on 9-9-14 draft action #'s</p>	Added language as suggested to renumbered action WW-12 in supplemental document.
222	11/13/2014		EPA Region 1		These actions, under the new numbering, have been made priorities, except WW-7 (now WW-8 Improve and enforce pesticide/herbicide /fertilizer regulations and other Best Management Practices (BMPs) for agriculture and urban turf.) New actions have been added for WW that have been given a higher priority.

223	11/13/2014		EPA Region 1	<p>Make the following actions priorities: HW-2, HW-5, HW-6, HW-7, HW-17 (clarify), HW-19, HW-22 (prioritize and add restoration component) ---based on 9-9-14 draft action #'s</p>	<p>Implementation Actions under this theme 'Thriving Habitats and Abundant Wildlife' have been significantly altered, added and revised based on public comment since the Sept 8, 2014 draft. Priority Implementation Action recommendations have been taken into account.</p>
224	11/13/2014		EPA Region 1	<p>Make the following actions priorities: SC-5, SC-6, SC-15, (SC-21+SC-28) combine, SC-23 rework the name and attached plan to address EPA's concerns, (SC-25+SC-26 combined), SC-27, SC-31 -- based on 9-9-14 draft action #'s</p>	<p>Implementation Actions recommended as priorities were made priorities or added to new priorities as requested. Action were reworded or considered distinct enough not be combined.</p>
225	11/13/2014		EPA Region 1	<p>Make the following actions priorities: SM-1, SM-3, SM-9 (important to highlight monitoring workshop), (SM-10+SM-11 combined), SM-14, (SM-16+26 combine), SM-19, SM-22, SM23, SM-26, SM-31, (SM-37+SM41 combined), SM-40, Sm-43 -- based on 9-9-14 draft action #'s</p>	<p>The top ten priorities are as requested, an attempt was made to limit the number of priorities for each theme. Some actions were moved to a different theme for better fit (SM-10 & SM-11 sifted to WW-30 & WW-34). Actions were reworded or were considered distinct enough not be combined.</p>
226	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>It is recommended that the introduction note that decentralized wastewater treatment systems (DWTs) serve approx. 40% of CT's pop and comprehensive management of these systems remain a challenge, which is a concern since almost the entire state of CT is in the LIS watershed. If this section is revised to mention DWTs, it would be noted such systems include conventional septic systems, older antiquated systems such as cesspools, and alternative/package treatment systems, and it would seem appropriate to mention these systems are typically utilized in rural and low density suburban areas that lack public sewer infrastructure. It is noted that the DWTs is a defined term in the glossary, however no acronym is provided. Conversely, OSWTS has an acronym, but is not a defined term. DWTs and OSWTSs are for the most part the same sewage treatment systems in CT.</p>	<p>One of the central challenges in the Clean Waters and Healthy Watersheds theme is <i>Further reducing nitrogen pollution requires addressing sources that are smaller, more diffuse, or more distant from the Sound</i>. One of the corresponding solutions is to <i>Reduce nitrogen from decentralized, on-site wastewater treatment systems and turf fertilizer applications</i>. This topic is generally mentioned in the CCMP using the term on-site wastewater treatment systems (OSWTSs) and there are actions related to dealing with them. Added term in the glossary and the list of acronyms.</p>
227	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>Page 18 in Section 3 includes a discussion of the densely populated/developed Western Sound area, and it notes that the higher pop. contributes higher volumes of sewage to septic systems and cesspools. This the first mention of septic systems and cesspools in the document. If DWTs are not mentioned in Section 1 of the draft, it is recommended that the term be introduced in this section, along with the above noted comments.</p>	<p>This topic is noted in the 'Underlying Principles' section as a continuing challenge for Long island Sound and resiliency to climate change.</p>

228	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>Page 24 of section 4 includes a paragraph that starts out mentioning the damage caused by the storm surge of Superstorm Sandy, and the next sentence notes that WWTP discharge over 1 billion gallons of effluent into LIS every day. It may be helpful to connect the 2 thoughts by noting the bypass of the millions (confirm) of gallons of untreated sewage from WWTPs, septic systems, and stormwater systems that has the potential to release untreated waste into LIS. It should be noted that the vast majority of untreated sewage discharges to the LIS caused by floods originates from WWTPs, and as such, reference to septic systems in that sentence should be removed. Typically, floods render septic systems inoperable, and cause malfunction conditions. DWTS considerations should be mentioned in the climate change discussion. SLR and storm surge impacts are matters that affect DWTSs.</p>	<p>This section has been reworked to incorporate integrative principles that have emerged as key challenges and environmental priorities. Specific wording has been added to supplemental Implementation Actions.</p>
229	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>Section 5: It should be noted that CTDOH is an acronym, listed to stand for CT Department of Public Health (CTDPH), but neither CTDOH nor CTDPH is utilized in the draft.</p>	<p>Changed acronym accordingly in supplemental Implementation Action document.</p>
230	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>Strategy 1-1b4 cites improved management of contaminants and nutrients from decentralized, package, and OSWTSSs, and their impact on groundwater. As previously noted DWTSs is a broad category of sewage systems that include OSWTSSs, and they may be conventional septic systems, primitive cesspools, or alternative/package treatment systems. It is recommended that the wording of this strategy be revised to cite improved and comprehensive management of DWTSs, which will provide improved renovation of wastewater contaminants and nutrients to protect both groundwater and surface water. Objective 1-3c cites improvements to access and usage of info, databases, and resources and incorporation of data into management actions. It may be helpful to mention CTDPH in the collaborative efforts between LISS and partner organizations.</p>	<p>Reworked to read 'Strategy 1-1a8: Improve management and performance of decentralized, package, and on-site wastewater treatment systems (OSWTSSs)' and specific language has been added to actions WW-10, WW-11, SM-1, SM-2 and SM-24 to address this strategy. CTDPH was also added as a partner organization.</p>

231	11/13/2014	Robert Scully	CT Dept. of Public Health	Table 1 includes various IAs that concern DWTSSs, and again various terms (septic systems, OSWTSSs, etc.) are used in different IAs. The cited actions for improved policies, understanding and management, and climate change sitting apply to all DWTSSs, and it is recommended that the other terms be replaced with DWTSSs. It is recommended that "comprehensive management" of DWTs be cited rather than just "management" of such systems to support broader management that is in-line with EPA guidance.	Revised to use consistent wording throughout document. Recommended language added.
232	11/13/2014	Robert Scully	CT Dept. of Public Health	WW-11 cites the development of a nonpoint source and stormwater tracking system tool for the LIS watershed. DWTSSs are considered nonpoint sources of pollution, however, it is not clear if the development of such a tracking system would include a system for DWTSSs.	The tracking system is under development and is designed to be adjustable as information and needs are identified.
233	11/13/2014	Robert Scully	CT Dept. of Public Health	WW-9: It is recommended that this IA cite a collaborative LID program that works with DWTS regulators.	Renumbered as WW-1 and includes suggested partner collaboration language.
234	11/13/2014	Robert Scully	CT Dept. of Public Health	It is recommended that CTDPH and local health officials be mentioned in Outcome 3-3.	Objective 3-3a now includes health professionals.
235	11/13/2014	Robert Scully	CT Dept. of Public Health	Outcome 3-4 cites sustainable and resilient wastewater treatment systems., and hopefully that means both centralized (sewers) and decentralized (DWTSSs) wastewater treatment systems. Outcome 3-4 reference municipal comprehensive management plans. It would be helpful to encourage the development of a municipal template plan at the state level to ensure essential plan components are addressed.	New, or reordered strategies and actions under 3-4a have been included and are related to technical assistance and support for development of plans; these will include consistency among plans; In addition, the WW theme's strategies 1-1a8 and 1a9 and associated IAs (WW-10, 11, 12) apply to this comment
236	11/13/2014	Robert Scully	CT Dept. of Public Health	Outcome 3-5 cites infrastructure planning, which historically has been tied to public water and sewer facility planning. Local communities without public water or sewer infrastructure should be encouraged to undertake similar planning actions but with decentralized options considered. Decentralized sewage system planning should be supported at the state level as a proactive pollution prevention measure that municipalities should embrace.	The related Implementation Actions were revised as suggested.

237	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>Table 3 lists IAs that include supporting communities as they develop and adopt muni sustainability and coastal resiliency plans. These actions and the training and technical assistance on sustainability, adaptation, and resiliency concepts should include coordination with and support for state regulatory agencies involved with on-site sewage disposal. LID and green infrastructure initiatives should also be coordinated with on-site sewage disposal regulatory agencies to ensure preservation of code complying areas for wastewater generating buildings and to ensure stormwater infiltration systems don't negatively impact on-site sewage disposal systems.</p>	The related Implementation Actions were revised as suggested.
238	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>SM-22 should include supporting involvement of and communication with state agencies (i.e., CTDPH) in addition to local governments.</p>	<p>SM-22, now SM-19, focuses on federal, state, and other partners supporting involvement of local communities. The importance of program coordination with state agencies is emphasized in SM-18. The supplemental document on SM-18 was edited to emphasize importance of multiple state agencies, including CTDPH.</p>
239	11/13/2014	Robert Scully	CT Dept. of Public Health	<p>SM-28 concerns capitalization of CWSRF to adequately finance clean water needs, and it should be recognized that EPA has been encouraging states to re-evaluate their CWSRF programs to ensure decentralized sewage needs are adequately determine and sufficiently funded.</p>	This Implementation Action (now SM-27) was revised as suggested.

WW-14 This action references improved management of decentralized wastewater systems in accordance with EPA's voluntary guidelines, which is a policy that the CTDPH has historically supported. Funding sources for this policy reference each state's SRF loan program, and this is in line with EPA recommendations that promotes use of CWSRF as a means for states to implement comprehensive wastewater system management programs, and EPA has been encouraging states to re-evaluate their CWSRF programs to ensure decentralized needs are adequately determined and sufficiently funded. This action item also encourages CT & NY health agencies to "discuss nutrient removal systems" and the performance metric mentions incorporating local sewer districts, tracking installations, and replacement of conventional systems with decentralized systems. The wording in relative to these points needs to be clarified. It is assumed that the last metric is meant to concern replacement of conventional septic systems with nutrient reducing alternative treatment (AT) systems, and it must be understood that currently in CT, AT systems are not regulated by health agencies, but rather by DEEP. DPH has been advocating improved and comprehensive management of all decentralized wastewater systems that include conventional septic systems and AT systems.

240 11/13/2014 Robert Scully

CT Dept. of Public Health

This Implementation action has been renumbered (WW-10) and revised as suggested.

WW-15: It's not clear why denitrifying systems are noted to improve nitrogen and pathogens, and its recommended the wording be revised to note the promotion of greater use of AT systems and more appropriate use of conventional systems for improved wastewater renovation including nutrient and pathogen reduction. The noted cooperators and partners mention implementation of this action item at the local level, and research by an academic or consulting agency partner. State level agencies need to be also be included in sewage system management as discussed in WW-14, and reference to such management should be included also in WW-15

241 11/13/2014 Robert Scully

CT Dept. of Public Health

This Implementation action has been renumbered (WW-11) and rewritten, adding language to include state agencies in the supplemental document.

242	11/13/2014	Robert Scully	CT Dept. of Public Health	WW-16: The title of this action item needs to be expanded to cover all decentralized wastewater systems including AT systems, community systems, in addition to septic systems, especially since the action item text specifically mentions decentralized treatment plants, which are assumed to be AT systems serving individual properties and cluster developments. The project description cites the CT and NY state health agencies for being charged with working with munis to oversee and implement regulations for such systems and septic systems. See comments under WW-14 and 15 for comments about comprehensive management of decentralized systems and jurisdiction of AT systems in CT.	WW-16 has been incorporated, renumbered and revised into WW-10, WW-11, and WW-12.
243	11/13/2014	Robert Scully	CT Dept. of Public Health	WW-17: The EE program is in support of this action item, however LID/Stormwater Infiltration Programs need to be coordinated with on-site sewage disposal programs at the state and local level as discussed in the July 16, 2014 Internal Draft Comments.	Added language to renumbered and revised Implementation Action WW-12 for increased coordination at all levels.
244	11/7/2014	Michael Craghan	USEPA	CCMP should be as much a management blueprint for community based planning as it is an action plan, and the draft I have does not get into the details of how LISS works. Those of us who are closely involved know the history of the program and how LISS works, but his should be something that others can get from the document too.	The material is all readily available on the LISS website. This information, however, was added to page seven of the final CCMP under the Long Island Sound Study heading.
245	11/7/2014	Michael Craghan	USEPA	Should include how the first CCMP came about and something about LISS participation and governance. - Who makes up the management conference and the advisory committee? - What is the collaborative approach to decision making about the study area? - How are annual work plans developed?	See response to line #244.
246	11/7/2014	Michael Craghan	USEPA	Should provide the reasoning and backup evidence as to why those issues are the important issues. - Tell us why your issues are your issues? - What is your scope (320?)? - Why these actions? How do you decide?	Information on the scope (320 & 119) and authorization for the LISS has been added to page seven of the final CCMP under the Long Island Sound Study heading. The connection between and evolution of the issues identified in the 1994 CCMP were made more explicit. Also added 'Challenges & Solutions' table to each theme to better highlight issues and focus. Actions were chosen through both a top-down, from EPA Strategic Plan, Federal and State identified initiatives and the 1994 LIS CCMP & a bottom-up approach through established LISS work groups, CCMP core team discussions and Management Committee meetings.

247	11/7/2014	Michael Craghan	USEPA	Include when we should expect the next CCMP? (10 years?)	The CCMP specifically commits to a new set of Implementation actions every five years. Any adjustments/updates to Outcomes, Objectives, and Strategies can be made at that time. However, as constructed, this CCMP sets a course for the next 20 years.
248	11/7/2014	Michael Craghan	USEPA	Under Characterization section: Should note the initial characterization and Status+Trends. - Should also include the Sound Health 2012 status and trends report as an appendix (doesn't have to be actual pages in the document, it could be an appendix reference but it needs to live online in the same place as the CCMP) - Refer to The Urban Sea when appropriate.	Sound Health is the source of much of the condition assessment material under the "The Recent History and Health of LIS" section and is included as a reference and link in the CCMP. The LIS book <i>Prospects for an Urban Sea</i> also was cited where appropriate.

249	11/7/2014	Michael Craghan	USEPA	Section 8 should have a discussion on monitoring. Describe how you will know your efforts are working (monitoring). I think this can reformat and reference other content/documents. But it should be quickly accessible; readers should not have to puck through the CCMP to find how your strategic plan calls for monitoring about how it is doing. - Consider using the IAs that are related to monitoring, to create a new CCMP section and IA table that describes how LISS intends to "monitor the effectiveness of actions taken pursuant to the plan" - A sentinel monitoring plan can be included by reference too. - If monitoring is related to work plan decision making, some illumination of that process would be helpful.	The final CCMP includes a new <i>Section 4 Monitoring</i> . This section describes both environmental and programmatic monitoring. In addition, each Implementation Action has a section marked "Performance metrics" that attempts to get at management milestones for each action. For each of the 20 ecosystem indicators/targets are explained in Appendix B. Monitoring plays an important role in the 2015 LIS CCMP, with many individual Implementation Actions address various monitoring needs, as well as a full Objective under Sound Science and Inclusive Management <i>Objective 4-1b: To maintain and enhance monitoring and assessment programs to increase understanding of Long Island Sound and assess progress toward management outcomes</i> . Sentinel monitoring for climate change was included by reference where appropriate.
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250	11/7/2014	Michael Craghan	USEPA	Climate Change: In the next 5 years LISS will almost certainly have to complete a program-centered, risk-based vulnerability assessment of how climate change will affect its CCMP goals. You should have an implementation action (probably in the Sound Science and Inclusive Management section) that speaks to that kind of activity. In the next few years it is likely that LISS will be asked to attest that its annual workplans are climate resilient investments that will provide their intended benefits even as the climate changes. I don't know if that needs a specific implementation action, but the program's CCMP should prepare it to accommodate such a request.	The final CCMP includes <i>SM-32: Develop a vulnerability assessment of how climate change will affect attainment of the CCMP goals and objectives</i> . A cross-cutting theme of the CCMP is resiliency to climate change, and numerous actions refer to the need to consider climate change in planning and implementation.
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