

March 2, 2020
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Comments on DEP's Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) for Citywide/Open Waters Recommended Plan Summary

Save the Sound is a nonprofit organization representing over 4,200 member households and 10,000 activists statewide. Our mission is to protect and improve the land, air, and water of the entire Long Island Sound region. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

We are writing to comment upon DEP's Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) for Citywide/Open Waters Recommended Plan Summary. We are concerned that DEP's plan, as summarized, like previous New York City CSO plans before it, fails to comply with the EPA's CSO Control Policy and is not guided by sound science. Consequently it fails to protect human health and the environment in and around the New York City area.

Most specifically to the East River and Long Island Sound, the summary fails to:

- (1) Utilize the correct dissolved oxygen Water Quality Standards and accurately characterize New York City waters' fail to meet them,
- (2) Analyze or address floatables and enterococcus,
- (3) Consider a reasonable range of alternatives that are not entirely cost prohibitive,
- (4) Analyze full, rather than partial, compliance with Water Quality Standards,
- (5) Accurately characterize the impacts of climate change pursuant to New York policy, or
- (6) Release its full Long Term Control Plan and supporting data for public review and comment.

The considerable distortions in DEP's characterizations of waters meeting Water Quality Standards not only undermine those conclusions but undermine its use of, and interpretation of data, throughout the entire LTCP. As a result, DEP must not only redo it's analysis to comply with law and sound principles of science, but it must release the entire LTCP (rather than a selective and deceptive summary), and the data upon which it relies, to the public for full review and comment to ensure a transparent, honest, and reliable process.

(1) DEP's statement regarding East River/ Long Island Sound's compliance with Water Quality Standards are demonstrably false and there is extensive, readily available, data to the contrary.

DEP's representations on page 46 of the Recommended Plan Summary that the East River/Long Island Sound area is meeting Water Quality Standards for dissolved oxygen is transparently, and demonstrably, false. As we are trying to understand and address the substantial problems that these waters face, misleading and inaccurate characterizations of them as meeting current water quality criteria are both irresponsible and counter-productive.

The numeric Water Quality Standards applicable to East River require that dissolved oxygen ("DO") shall not be less than 4.0 mg/L at any time. Long Island Sound is classified as Class SB waters, for which DO shall not be less than a daily average of 4.8 mg/L and shall not be less than 3.0 mg/L at any time. Remarkably, DEP represents that East River/Long Island Sound are meeting these Water Quality Standards despite extensive data and scientific consensus to the contrary.

In their response to comments about their failure to accurately assess compliance with DO Water Quality Standards, DEP simply states that "the acute standard for DO is based upon a formula that allows for DO concentrations to fall below the standard for a limited number of days." Public Comment Response Summary p. 15. Yet the Water Quality Standards plainly say that DO for SB waters shall not fall below 3.0 mg/l "at any time" and DO for I waters shall not fall below 4.0 mg/l "at any time." The formula for averaging applies to the chronic standard, not the acute standard.

By way of example, we have attached the Long Island Sound monitoring survey maps demonstrating extreme hypoxic, and even anoxic, conditions from this last summer. This survey is compiled annually and monthly by CT Department of Energy and Environmental Protection and the Long Island Sound Study.³ The July 15 – 17 map shows that there was a 46.1 square kilometer area that fell below 3.0 mg/l. Much of this area is within the area impacted by sewage overflows.⁴ The August 12 – 14, 2019 map shows a 38.2 square kilometer area actually fell below 1% during that period, becoming not only hypoxic but anoxic.⁵ Again, this is the area of Long Island Sound furthest west and most impacted by the sewage overflows in question. We have also attached the 2018 Long Island Sound Hypoxia Review report that documents that between 1994 and 2018 dissolved oxygen levels in the vast majority East River Long

https://www.ct.gov/deep/cwp/view.asp?a=2719&g=325532&depNav GID=1654

https://www.ct.gov/deep/lib/deep/water/lis_water_quality/monitoring/currentyear/lis-narrativemap_6-august-hy.pdf

¹ 6 CRR-NY 703.3.

 $^{^2}$ Id

³ Resource page available at

⁴Dissolved Oxygen in Long Island Sound Bottom Waters, CT DEEP and Long Island Sound Study, available at https://www.ct.gov/deep/lib/deep/water/lis_water_quality/monitoring/currentyear/lis-narrativemap 4-july-hy.pdf

⁵ Dissolved Oxygen in Long Island Sound Bottom Waters, CT DEEP and Long Island Sound Study, August 13 – 15, available at

Island Sound area fell under the 3.0 mg/l standard 90%–100% of the years (There was a small portion that fell below 3.0 mg/l standard 70%-100% of the years).⁶

Moreover, New York City's own New York Harbor Water Quality Data demonstrates numerous times each year from 2006 to the present that dissolved oxygen in the East River/Long Island Sound violated Water Quality Standards. In 2019 alone, there are 46 documented instances of class SB waters falling below 3.0 mg/l or Class I waters falling below 4 mg/l.

In response to a question at the public meeting, DEP explained that their conclusion that the East River and Long Island Sound were in compliance with Water Quality Standards was based upon annual averaging. Water Quality Standards for dissolved oxygen, however, include daily averages and acute standards – not annual averages. That reality must be reflected in the study and in the alternatives that are chosen. While DEP justifies their use of the methodology as approved by DEC, even if that is the case, that agency has no authority to modify the Water Quality Standards without going through a formal regulatory process to do so. If it is the case that DEC, the agency charged with protecting New York water quality, in fact approved a methodology that is completely inconsistent with and unrelated to the Water Quality Standard itself, that is an even greater cause for concern for clean water and responsible government action to protect it.

While this might be the most blatant example of DEP inappropriately skewing data to make it appear that water quality is better than it actually is, it is far from the only one. As pointed out in previous comments from the SWIM Coalition,

- (1) DEP uses different rainfall models for the same period,
- (2) DEP inappropriately uses depth averaging rather than sampling bottom waters,
- (3) DEP failed to sample waters in the maximum hypoxia season from July to September, and
- (4) DEP inappropriately combined seasonal LTCP sampling data with year round harbor monitoring data.

Regarding the criticism that DEP did not adequately account for nitrogen pollution and dissolved oxygen impairments, DEC refers to its own data which has allegedly shown that the total portion of nitrogen load to the Open Waters waterbodies attributable to CSOs is so low that reductions in it would not have an actual impact on receiving water quality. First of all, this does not address the misrepresentation regarding compliance with Water Quality Standards within the waterbody. Moreover, DEP fails to provide any data or modeling to back up this claim. The first thing DEP must do is to accurately characterize the natures of the water as severely hypoxic in the summer season and out of compliance with Water Quality Standards. Subsequently, DEP must evaluate CSO's to determine whether they are causing or contributing to this impairment. To date, DEP has done neither.

⁶2018 Long Island Sound Hypoxia Review, CT DEEP, IEC, and EPA, p. 8 available at http://www.iec-nynjct.org/sites/default/files/2019-08/2018-Combined-Report Final.pdf

(2) DEP has failed to adequately analyze or address either floatables and enterococcus

In addition to the issues set forth above, the summary document and the public hearings failed to address either floatables or enterococcus. Floatables are part of the Water Quality Standards. While EPA states they will address them in the actual Long Term Control Plan, they have given no indication why they could not, or did not, address them in the summary. Moreover, DEP's past practice has been not to have a public comment period on the actual LTCP which would eliminate meaningful input from the public on this issue altogether.

With respect to enterococcus, by letter of May 19, 2016, EPA has notified DEC that they will be expected to modify their current Water Quality Standards to set levels for enterococcus that will be protective of public health pursuant to the Clean Water Act "as soon as possible." Given this, DEP must not only consider compliance with Water Quality Standards that are in place today, but must consider the Standards that should will be in place at the time the LTCP is put into effect. Failing to address these pollutants is another way in which the LTCP falls woefully short of, and is inconsistent with, the requirements of the CSO Control Policy and the CWA.

(3) DEP's use of 95% attainment of Water Quality Standards is inconsistent with the Clean Water Act, the EPA 1994 Combined Sewer Overflow Control Policy and DEP's Consent Order.

In response to concerns that DEP was only modeling 95% compliance with Water Quality Standards, DEP simply explained that that was the methodology they proposed to DEC and was accepted. Yet, that methodology is inconsistent with EPA's CSO Control Policy and fails to meet the standard of actual compliance with Water Quality Standards. DEP uses this 95% criteria throughout the LTCPs to predict future bacteria and DO concentrations. But nowhere in the CWA is attainment based on only 95% attainment and there is no authority that we are aware of to support such an interpretation. By definition, 95% attainment is 5% nonattainment. While percent attainment is not generally a metric used (actual compliance is), countless Clean Water Act cases have been brought to enforce violations that were less than 5%. In a case like sewer overflows, where we are concerned with the acute impacts of periodic but intense pollution events, 5% non-compliance is more than enough to cause substantial harm to human health and the environment.

The regulatory backdrop for this LTCP establishes the need to comport with actual regulatory standards, rather than statistical models developed by DEP and accepted by DEC yet not meeting such standards. Section 402(q) of the CWA and DEP's permit both require compliance with the CSO Control Policy. The Demonstration Approach of the CSO Control Policy requires that the LTCP be "in compliance with the requirements of the CWA" and be "adequate to meet WQS and protect designated uses." There is no

⁷ CSO Control Policy § II(C)(4)(b). Available at https://www.epa.gov/sites/production/files/2015-10/documents/owm0111.pdf

indication in the CSO Policy, the Clean Water Act or other guidance that 95 percent of compliance with Water Quality Standards is adequate.

At the public hearing on the Citywide LTCP, DEP explained that it chose 95% because it was within the margin of error of their methodology. Yet, margins of error do not go solely in one direction. The risk that the model could require measures that might exceed Water Quality Standards is accompanied by the risk that they could fall short. In other words, while it might be reasonable to suspect that 95% modelled compliance might represent 100% compliance, by that same reasoning it could also represent 90% or less compliance. Allowing DEP a 5% cushion in only one direction is unjustified and constitutes an unjustified dilution of the Water Quality Standards.

(4) DEP fails to consider a meaningful range of alternatives that are (a) viable and (b) not cost-prohibitive.

The list of potential alternatives for LTCPs were only analyzed in terms of their cost-effectiveness, with no regard to the water quality impacts associated with these alternatives. While DEP purports to have considered 9 alternatives, four of those were not viable alternatives in the first place as they would increase CSO discharges to other tributaries (e.g. the Bronx River, Westchester Creek or Flushing Creek). Of the 5 viable options, three cost at least \$4,700 M. It remains unexplained why DEP did not consider any solutions ranging between ER-6 (86 MGY net CSO volume reduction; \$6 Bid Cost) and ER-7 (2,699 MGY net CSO volume reduction; \$4,700 Bid Cost) both in terms of the reduction result and the cost. A reduction to 86 MGY is a tiny portion of the total amount of sewage overflows and is facially insufficient to improve the water quality and address the substantial problems New York City waters are still facing. We urge DEP to consider a meaningful range of storage options that will significantly reduce CSOs and improve water quality.

(5) DEP has not justified its failure to use appropriate precipitation data for climate change for future years.

DEP has not responded adequately to the critique of failing to consider the increased precipitation caused by climate change and its challenges for the water system. Instead of taking the New York City Panel on Climate Change forecast of an increase of 4%-11% by 2050 and 5%-13% by 2080,⁸ DEP still bases its calculations on the rainfall average at JFK in 2008. DEP, in response to comments, states that the "average annual rainfall depth from 2010 to 2018 was less than the total annual rainfall from the 2008", and therefore "remains a good representation of *current* average rainfall conditions.⁹ However, this is a random statistic that fails to take into account the best projections of the rainfall for the appropriate future period. To imagine that this would remain at the 2008 level flouts sound science and real world conditions and constitutes another example of skewing data to mask the extent of the problem.

⁸ N Y City Panel on Climate Change, 2015 Report Executive Summary (2015), available at https://nyaspubs.onlinelibrary.wiley.com/doi/full/10.1111/nyas.12591

⁹ DEP Public Comment Response, p.5; emphasis added.

(6) DEP has provided only summary documents and has not committed to provide the actual Long Term Control Plan, along with the data upon which it relies, for public review and comment.

Throughout this process, DEP has provided only minimalist summary documents regarding the proposed Long Term Control Plan. Some of the misrepresentations and distortions in that summary plan have been addressed above. Yet we understand that DEP's intent is to stay with their past practice of not releasing the actual very detailed Long Term Control Plan that will ultimately be submitted. While the summaries can be a good complement to the LTCP itself, it is not a substitute. Given the concerns expressed above with representations about Water Quality Standards and how they are being calculated, along with failure to address key pollutants in the summary, it is also vitally important for DEP to release the underlying data and methodology to support their conclusions in both the LTCP and in the summary documents.

(7) Conclusion

In Summary, DEP has (1) misrepresented NYC waterbody compliance with dissolved oxygen Water Quality Standards, (2) failed to analyze important pollutants such as enterococcus and floatables, (3) failed to consider a meaningful range of alternatives, (4) failed to analyze full compliance with Water Quality Standards, (5) failed to use accurate future rainfall statistics, and (6) failed to make the full LTCP and the data upon which it is based available for public review and comment. As a result, neither the public nor regulators can have any faith that the Citywide LTCP will make New York City waters cleaner and safer as the Clean Water Act and the EPA CSO Control Policy require. We urge DEP to correct these flaws and re-issue a plan that is based upon the correct law and sound science. If DEP fails to do so on their own, DEC, as the state administrator of the Clean Water Act, should step in to require it.

Thank you for the opportunity to comment on these important matters.

Sincerely,

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2018 Long Island Sound Hypoxia Season Review





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Introduction

Designated as an estuary of national significance by Congress in 1987, Long Island Sound (LIS) is home to a diverse network of flora and fauna, with over 4 million people living in the Sound's coastal communities. It is an estuary of recreational, commercial, and socioeconomic value. The Sound is bordered by the states of Connecticut and New York and has a watershed area extending through Massachusetts, New Hampshire, Vermont, Maine and Quebec that encompasses over 16,000 square miles. Nearly nine (9) million people Live within the watershed. Over time, the Sound has been subject to the effects of increased nutrient loading as a result of urbanization and changes in land use (Latimer *et al.*, 2014).

The term "hypoxia" means low dissolved oxygen (DD) concentrations in the water. Marine organisms need oxygen to live, and low concentrations, depending on the duration and the size of the area affected, can have serious consequences for a marine ecosystem. As defined by the Long Island Sound Study, hypoxia exists when DD drops below a concentration of 3 milligrams per liter (mg/L), although ongoing national research suggests that there may be adverse affects to organisms even above this level. Nutrients, especially nitrogen, fuel the growth of microscopic algae called phytoplankton in the Sound. The phytoplankton die and settle to the bottom. Bacteria break down the organic material from the algae for food and fuel while using up oxygen. Seasonal weather patterns, particularly during the summer months, exacerbate the effects of nutrient loading. Calm weather patterns limit the mixing of the water column and replenishment of oxygen to the bottom waters, resulting in a decrease in bottom water DD over the course of the summer. Hypoxic conditions are mainly confined to the western Sound.

In response to the critical need to document summer hypoxic conditions in Long Island Sound, the Connecticut Department of Energy and Environmental Protection (CT DEEP) and the Interstate Environmental Commission (IEC), have monitored dissolved oxygen, as well as other key water quality parameters relevant to hypoxia, since 1991. This report presents a summary of data collected by CT DEEP and IEC during the 2018 hypoxia season.



Methods Overview

Since 1991, CT DEEP has conducted an intensive year-round water quality monitoring program on Long Island Sound. Physico-chemical parameters (temperature, salinity, DO, pH, and water clarity), nutrient samples, and plankton samples are collected monthly from 17 sites on a year round basis. Beginning in mid-June and extending through mid-September an additional survey is added that samples up to 48 stations every other week for physico-chemical parameters (Figure 1).

IEC has conducted summer season monitoring in the far Western Long Island Sound (WLIS, Figure 1, map inset) and the Upper East River since 1991. Since 2014, IEC's monitoring program has implemented modifications, including the collection of nutrients, to align it with CT DEEP's program. IEC collects physico-chemical data from 22 stations on a weekly basis and biweekly samples for nutrient parameters (Figure 1). Beginning in October 2018, IEC expanded its WLIS monitoring program to sample year-round.

The Long Island Sound Integrated Coastal Observing System (LISICOS) was established in 2003 as a component of a regional/national ocean observing system. The system was conceptualized as part of a water quality monitoring program that combined the traditional ship-based point sampling surveys with continuous, real-time sampling stations. LISICOS continuously monitors in situ water quality parameters and meteorological parameters at up to eight stations across the Sound. Sensors are attached to a moored buoy at various depths (surface, mid, bottom). Data are transmitted every 15 minutes in real-time via satellite where they are stored in a database and uploaded to the LISICOS website. The system is maintained by the University of Connecticut.

CT DEEP and IEC data provide a snapshot of hypoxic conditions during a specific timeframe while the LISICOS data provide a continuous measurement of hypoxia at specific buoy locations. Together these monitoring programs are better able to characterize the extent and duration of hypoxia across LIS. Both types of data contribute to a better understanding of hypoxia in LIS.

Further information on sampling and analytical methods for water quality parameters can be found in the EPA-approved <u>DEEP</u>, <u>IEC</u>, and <u>LISICOS</u> Quality Assurance Project Plans.

Dissolved oxygen data from 13 of IEC's 22 stations and all of DEEP's stations are incorporated into hypoxia maps and areal estimates that are presented in this report. The 13 IEC stations (A1, A2M, A3, A4, HA-3, HB, A5, HC1, HC, B1S, B2, B3M, B4) represent open water portions of the western Narrows. DO data collected from IEC's embayment stations are not utilized in areal estimates.

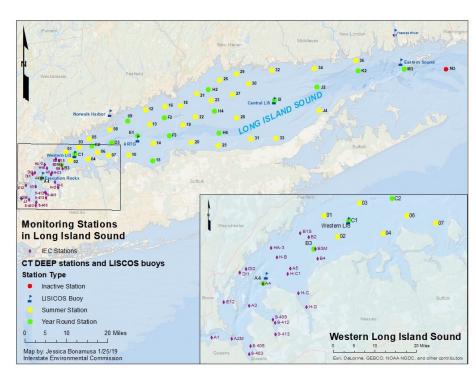


Figure 1. Hypoxia Monitoring Stations in Long Island Sound

CT DEEP collects monthly surface and bottom water samples from ten stations (triangles and circles, Figure 2) distributed across LIS for phytoplankton community analyses. Stations were chosen to examine the "spatial distribution and temporal dynamics of phytoplankton population structure and diversity in LIS" as well as to "investigate the potential contribution of the settlement of the phytoplankton materials from the surface water to hypoxia/ anoxia in the bottom water" (Zhang and Lin 2018). Samples are processed and analyzed by researchers with the Marine Sciences Department at the University of Connecticut. Results are detailed in final project report submitted to CT DEEP. Collection methods and processing methods are available in an EPA approved Quality Assurance Project Plan.

CT DEEP collects monthly composite water samples and conducts oblique plankton tows from six stations (triangles, Figure 2) distributed across LIS for zooplankton community analyses. Samples are processed and analyzed by researchers with the Marine Sciences Department at the University of Connecticut. Results are detailed in <u>final project report</u> submitted to CT DEEP (Dam and McManus 2018). Collection methods and processing methods are available in an EPA approved Quality Assurance Project Plan.



Quality Assurance

The IEC and CTDEEP have been collecting data from the Sound since 1991. Both IEC and CTDEEP programs are designed to collect high quality data. IEC and CTDEEP sample collection and handling procedures are outlined in EPA-approved Quality Assurance Project Plans (QAPPs) and method-specific standard operating procedures (SOPs, see Methods section for hyperlinks to program quality assurance documents). Shared program goals include maintaining a long-term database of collected information and monitoring the extent of hypoxia within the Sound throughout the summertime (late June through mid-September) to assess achievement of the Comprehensive Conservation and Management Plan (CCMP) for restoring LIS.

Measures of data quality include completeness, representativeness, and comparability.

In 2018, IEC achieved an overall completeness rate of 95.8%; one run was terminated early due to unsafe weather conditions, resulting in 11 missed station visits. CT DEEP completed 401 station visits in 2018. The mid-March chlorophyll survey was not conducted due to weather, resulting in 6 missed stations visits and a 98.5% completeness rate for 2018.

IEC and CT DEEP met their data quality objectives for representativeness and comparability as specified in their respective QAPPs. Station locations for both programs were chosen to be representative of ambient conditions Soundwide. With the expansion of IEC's program to year round monitoring beginning in the fall of 2018, both programs will sample representative temporal conditions. Most sampling and analytical procedures have remained unchanged over the course of the monitoring program. Consistent field and laboratory procedures, well documented by the appropriate SOPs, help ensure consistent and reproducible data. QC checks performed by the programs' analytical laboratories including continuing calibration verifications (CCV), blanks, duplicates and spike samples are used to flag suspect data and to ensure accuracy and precision of the results. Additionally, CT DEEPs analytical lab participates in a multi-lab comparison program that provides data

specifically to assess the analytical laboratory's ability to produce data comparable to several other laboratories located in the Northeast and Mid-Atlantic regions of the United States. IEC hopes to begin participating in this multi-lab comparison program in 2019.





RESULTS

Dissolved Oxygen

For Long Island Sound, DO levels below 3 mg/L are considered hypoxic, causing mobile animals to leave and sessile animals to die or be physically or behaviorally impaired. However, early studies in LIS by CT DEEP Marine Fisheries biologists found that DO can become limiting below 4.8 mg/L for sensitive fish species, while more tolerant species are not affected until DO falls below 2 mg/L (Simpson et al, 1995, 1996). This study documented a 4% reduction in finfish biomass when DO levels are between 3.0-3.9 mg/L a 41% reduction occurs at 2.0-2.9 mg/L DO, and an 82% reduction in waters with



concentrations between 1.0 and 1.9 mg/L. Finfish biomass is reduced by 100% (total avoidance) in waters with DO less than 1.0 mg/L (Simpson et al, 1995, 1996).

CT DEEP conducted eight surveys during the summer of 2018 between May 30thth and September 12th (Table 1). At some point during the course of the season, stations 03, C2, A4, 12, 13, 21, B3, and D3 exhibited hypoxia. Hypoxic conditions were found during three surveys (Table 1). Summaries of CT DEEP bi-weekly sampling are available on the Department's website.

IEC conducted twelve surveys during the summer of 2018 between June 28th and September 12th (Table 1). Hypoxic conditions were found during five surveys (excluding embayment stations). All 13 of IEC's open-water stations exhibited hypoxic conditions at some point over the course of the season. Summaries of IEC weekly sampling are available on the Commission's website.

Dissolved oxygen plots from stations in WLIS are available in Appendix A. All data are available upon request.

Timing and Duration

The 2018 hypoxic event lasted an estimated **35 days** and began on July 30th. Between August 15th and August 22nd there was a clear period when DO concentrations rose and remained above 3.0 mg/L for 8 days. DO concentrations dropped below 3.0 mg/L again and remained below 3.0 mg/L until September 8th. This is also evident in the continuous data collected by the LISICOS Execution Rocks Buoy. Compared to the previous 31 years, 2018 was well below the average of 55 days (Figure 3).

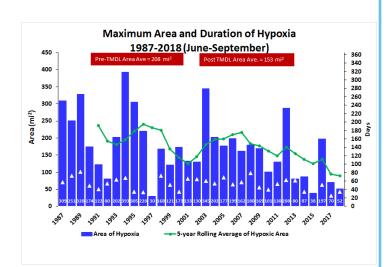


Figure 3. Maximum Area and Duration of Hypoxia. Blue bars represent area, white triangles represent duration, green line is the five-year rolling average of hypoxic area. The total area of Long Island Sound is 1,320 mi².

Table 1. CT DEEP and IEC Cruise Summary Information. See Figure 1 for station locations.

Cruise	Start Date	End Date	Number of stations sampled	Number of hypoxic stations	Hypoxic Area (mi ²)	Minimum DO	Station where minimum DO occurred
WQJUN18	5/30/18	6/5/18	17	0	0	6.69	A4
HYJUN18	6/12/18	6/12/18	21	0	0	5.84	02
IEC Run #1	6/28/18	6/28/18	22	0	0	5.14	8-403*
WQJUL18	7/2/18	7/5/18	41	0	0	3.38	A4
IEC Run #2	7/5/18	7/5/18	22	1	0	1.70	9-413*
IEC Run #3	7/12/18	7/12/18	22	0	NC	3.46	H-D
HYJUL18	7/16/18	7/18/18	36	0	0	3.7	A4
IEC Run #4	7/19/18	7/19/18	22	1	NC	2.64	8-403*
IEC Run #5	7/26/18	7/26/18	22	0	NC	3.93	A5
WQAUG18	7/30/18	8/2/18	40	1	20.7	2.58	A4
IEC Run #6	8/2/18	8/3/18	22	6	NC	2.41	H-C *
IEC Run #7	8/9/18	8/9/18	22	18	NC	1.01	H-D *
IEC Run #8	8/18/18	8/18/18	22	7	NC	1.47	H-D *
HYAUG18	8/13/18	8/15/18	38	2	7.6	2.81	03
IEC Run #9	8/23/18	8/23/18	22	1	NC	2.42	9-413*
WQSEP18	8/27/18	8/29/18	42	5	51.6	2.34	A4
IEC Run #10	8/30/18	8/30/18	22	11	NC	1.86	A4
IEC Run #11	9/9/18	9/9/18	22	11	NC	1.80	A5
HYSEP18	9/12/18	9/12/18	23	0	0	4.78	A4
IEC Run #12	9/13/18	9/13/18	22	1	NC	1.47	9-413*

Bold= Maximum Extent of Hypoxia

NC= Not Calculated

* Embayment Station

Area estimates

In order to maintain the continuity and comparability of the long-term data set, areal estimates are based on CT DEEP data only. It is expected that data from 1991-2018 will be re-interpolated using both the CT DEEP and IEC stations at some point in the future. CT DEEP and IEC data are synoptic and provide a snapshot of hypoxic conditions during a specific timeframe over a broad area, while the LISICOS data provide a continuous measurement of hypoxia at specific buoy locations over a more detailed span of time. This often results in disparity between the datasets.

Estimated Maximum Area Between 3.0 and 4.8 mg/L

In 2018, the maximum area of LIS bottom waters between 3.0 and 4.8 mg/L occurred during the WQSEP18 survey and was estimated at 545 mi². From 1991-2018, the area affected by <u>concentrations between 3.0 and 4.8 mg/L</u> averaged 587 mi² and varied slightly from 398 to 601 mi².

Estimated Maximum Area Below 3.0 mg/L

The 2018 peak hypoxic event occurred during IEC Run #10 and the WQSEP18 cruises between 27 and 29 August. The maximum area was 51.6 square miles. Compared to the previous 31-year average, 2018 was below average in area (Figure 2). The lowest dissolved oxygen concentration (2.34 mg/L) documented by CT DEEP during 2018 occurred on 8/27/18 at Station A4 (Appendix A, pg. A3). The lowest dissolved oxygen concentration documented by IEC during 2018 at an open water station was 1.53 mg/L and occurred on 8/7/18 at Station H-C (Appendix A, pg. A1). The Execution Rocks Buoy recorded its lowest reading, 0.30 mg/L, on 9/5/18, while the Western Sound Buoy recorded its' lowest reading, 1.65 mg/L, on 8/24/18.

Estimated Maximum Area Below 2.0 mg/L

Based on CT DEEP data, in 2018, bottom water dissolved oxygen concentrations were not less than 2.0 mg/L. The average area with concentrations less than 2.0 mg/L, calculated from 1991-2018, is 49.12 mi^2 . In 2018, based on CT DEEP estimates, there were 0 days with 00 < 2.0 mg/L. IEC documented concentrations below 2.0 mg/L at six of their open-water stations on 7 August and two of their open-water stations on 28 August. At the LISICOS Execution Rocks buoy, there were 25.11 cumulative days below 2.0 mg/L.

Estimated Maximum Area Below 1.0 mg/L

CT DEEP and IEC did not document DO concentrations less than 1 mg/L in 2018, However, this year the LISICOS Execution Rocks buoy (Station A4) documented a minimum DO of 0.30 mg/L and 9.22 cumulative days with DO concentrations less than 1.0 mg/L. The overall average area affected from 1991-2018 is 11.06 mi². The greatest area with DO below 1 mg/L (62 square miles) was during the summer of 2003.

Frequency

The percent of WLIS stations that experience hypoxic conditions continues to be between 90 and 100% (Figure 4). However, stations C2, D3, E1, D9, and 15 seem to be showing improvement; in the 1990's these stations were hypoxic about 60-80% of the time, while over the past four years they were hypoxic only about 10-30% of the time.

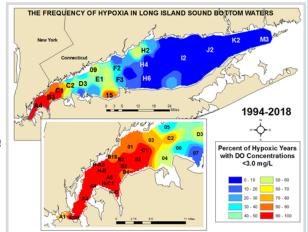


Figure 4. Frequency of Hypoxia in Long Island Sound Bottom Waters

WATER TEMPERATURE

Water temperature plays a major role in the timing and severity of the summer hypoxia events. Water temperature differences in the Western Sound during the summer months are particularly influential in contributing to the difference in dissolved oxygen content between surface and bottom waters. The density stratification of the water column creates a barrier between the surface and bottom waters, and it is this barrier, the pycnocline (where the change in density with depth is at its greatest), that prevents mixing between the layers.

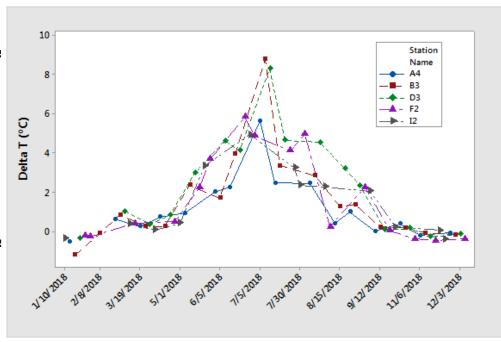


Figure 5. Progression of Stratification across Long Island Sound in 2018.

Delta T= surface water temperature minus bottom water temperature

In 2018, stratification began to set up in May (Figure 5) . Delta T's (the difference between surface and bottom

water temperature) peaked in the Western Narrows in early July. Destratification (fall turnover) began around mid-September. The 2018 maximum surface temperature was 26.18°C recorded on July 31 at Station H4. The minimum surface temperature was 0.16°C at Station A4 recorded on January 11.

Both surface and bottom water temperatures in LIS appear to be increasing. The surface and bottom temperatures from CT DEEPs 17 year round monitoring stations are averaged and then plotted in Figure 6.

Additional information is available on the LISS website.

Temperature data are available in Appendix B.

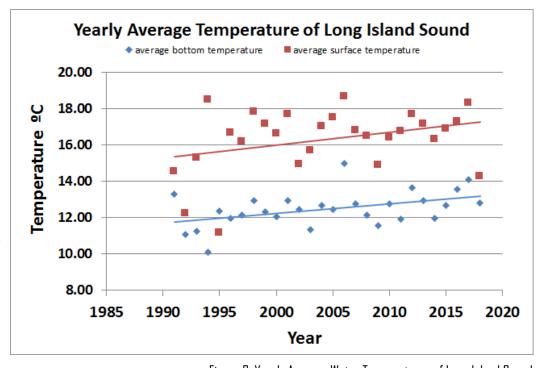


Figure 6. Yearly Average Water Temperatures of Long Island Sound

Water Clarity

Water clarity in Long Island Sound follows a west to east gradient, with clarity improving as you move eastward (Figure 7). The graph below highlights this gradient present in Long Island Sound. In 2018, the Western-most axial station (A1 near the Whitestone Bridge) had an average summer Secchi disk depth of 1.5 meters, whereas the eastern-most axial station (M3 near Fishers Island) had an average summer Secchi disk depth of 4.2 meters. The eastern portion of Long Island Sound is a wide and deep channel with considerable influx from the Atlantic Ocean. This exchange of waters increases water clarity in the Eastern Sound. The Western Sound is more narrow and shallow compared to the Eastern Sound and its surrounding land is densely populated and developed. This results in less of an exchange of waters and also increases the concentrations of pollutants in the water that may affect water clarity.

Individual station data from 2014-2018 are available in Appendix C.

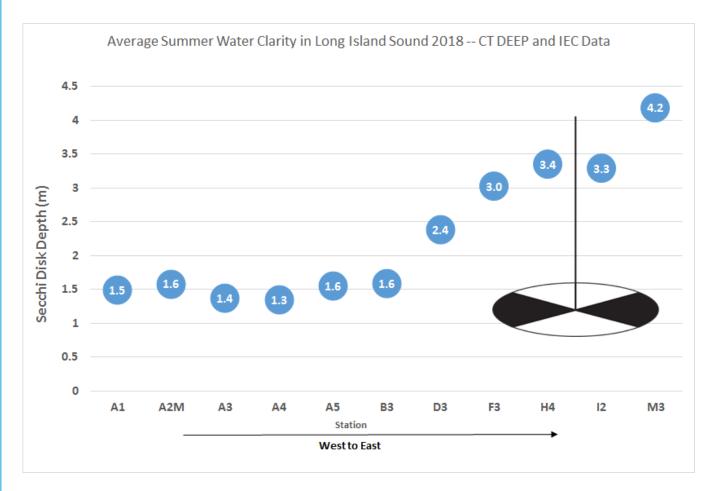


Figure 7. 2018 Average Summer Water Clarity across Long Island Sound

pН

In Long Island Sound eutrophication can contribute to coastal acidification (Wallace et. al., 2014). Excess nutrients fuel algae and phytoplankton growth. As the phytoplankton die and decay, carbon dioxide (CO2) is released. This release has the same effect on pH as carbon dioxide from atmospheric deposition (NECAN undated; Appendix D, pg. D4). EPA released guidelines for measuring changes in pH and carbonate chemistry in eastern coastal waters in 2018 (Pimenta and Grear, 2018). Two of four parameters are needed to describe the seawater carbonate system- pCO2, DIC (dissolved inorganic carbon), alkalinity, and pH, along with temperature and salinity measurements. As of 2018, CT DEEP and IEC only collect one of the four needed parameters - pH. In 2019, the LISICOS Western Sound buoy will be equipped with a pCO2 sensor.

Data from the 2014-2018 monitoring seasons, are available in Appendix D.

Chlorophyll-a

The <u>spring phytoplankton bloom</u> occurs in Long Island Sound between February and April. Historically high levels of chlorophyll a in the Western Sound during this time have been linked to summertime hypoxia conditions. Chlorophyll-a samples are collected <u>year-round</u> by CT DEEP while IEC currently only samples during the summer months. Beginning in October 2018, IEC sampling will expand to year-round.

In 2018, the spring bloom occurred during March, April, and May. The maximum chlorophyll a concentration (26 ug/L) measured in LIS in 2018 occurred at Station A4 on July 5. A minor fall bloom occurred in September and October.

2014-2018 data are available in Appendix E.

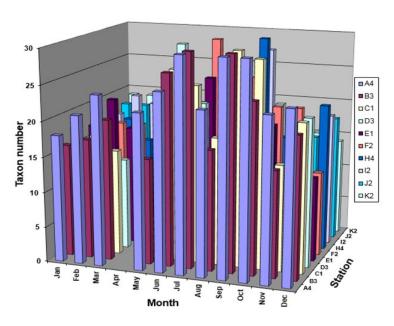


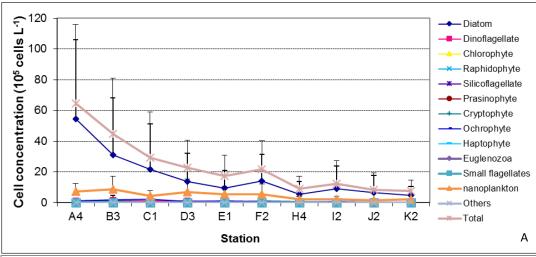
Nutrients

DEEP has collected monthly nutrient data from 17 stations since 1991. IEC began collecting bi-weekly nutrient data in the summer of 2014 at 11 of their 22 stations. See Appendix F for dissolved organic carbon (DDC), dissolved inorganic phosphorus (DIP), dissolved silica (SiO2), and nitrate + nitrite (NOx) data from select stations for the last 5 years. Data for these and additional nutrient parameters from all 17 of DEEPs stations and 11 IEC stations are available upon request.

Phytoplankton

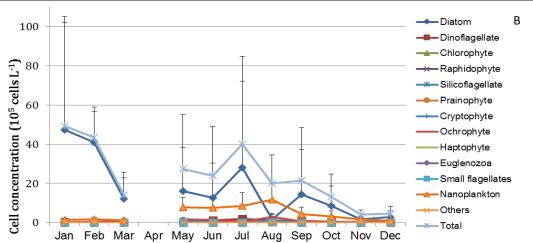
In 2018, UCONN researchers analyzed 110 surface and 110 bottom water samples for phytoplankton community abundance and composition. Ninety four (94) taxa were identified from the surface water samples. Phytoplankton abundance was classified by the scientists as medium. In 2018, in the surface waters, there was a major winter bloom in January, a major early summer bloom in July, and a smaller late summer bloom in September (Figure 8). The assemblages were dominated by diatoms throughout all four seasons in 2018 (Figure 9). Generally, Western Sound stations exhibited higher cell counts than Eastern Sound stations with A4 having the highest average monthly cell counts.





From <u>Zhang and Lin,</u> 2018.

(Above) Figure 8.
Temporal and spatial variation of phytoplankton species number in LIS surface water samples in 2018.

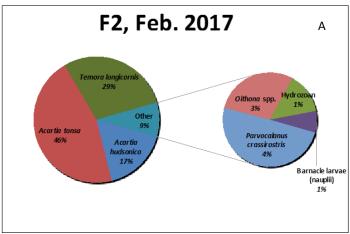


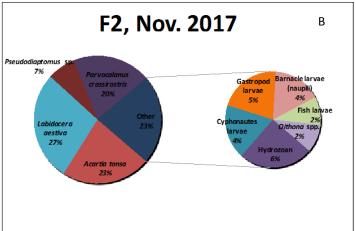
(Left) Figure 9. (A)
Spatial distribution of phytoplankton abundance in LIS surface water samples and (B) Temporal changes in phytoplankton cell concentration in LIS surface water samples in 2018.

Zooplankton

Data presented are from **2017**, the most recent year available. Bullet points and graphs were excerpted from <u>Dam and McManus (2018)</u>. Station B3 was not sampled in April 2017.

- Of the 10 phyla (Annelida, Arthropoda, Brachiopoda, Bryozoa, Chaetognatha, Chordata, Cnidaria, Ctenophora, Echinodermata, and Mollusca) typically found in LIS, the Arthropoda, especially copepods, dominated the mesozooplankton composition throughout the year.
- Mesozooplankton abundance increased at all stations during the first half of the year, with a spring peak in April, and reached the yearly maximum in June at all stations (Figure 10).
- For 2017 peak abundance occurred at station F2, followed by station H4. Station K2, in the easternmost Sound continues to show the lowest abundance
- The three dominant species among copepods continue
 to be Acartia hudsonica and Temora longicornis during
 the winter and spring, and Acartia tonsa during the
 summer. However, this latter species is now present in
 LIS almost year round. In 2017, it was only absent in May
 and June.





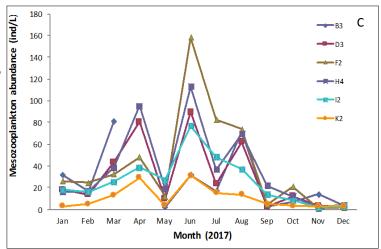


Figure 10. From Dam and McManus 2018.

- Mesozooplankton composition (expressed as percentage abundance) at station F2, May, 2017
- B. Mesozooplankton composition (expressed as percentage abundance) at station F2, November, 2017
- C. Total mesozooplankton (200-2000 μm) abundance for the period Jan-Dec, 2017. Each point is the average of duplicate samples at each station.

Discussion

Weather

The Northeast Regional Climate Center (NRCC) at Cornell University is tasked with disseminating climate data and information for 12 states, including NY and CT. The summer of 2018 was warm and wet (Figures 11 and 12). The season started out with near normal temperatures and average rainfall in June but Mother Nature turned up the heat, humidity, and precipitation in July. August was the second warmest on record for the Northeast and the rains persisted. The deluge continued into September and through the first half of October; in fact it was the wettest September on record for Bridgeport with 8.59 inches of rain recorded (247% of normal). October temperatures were warmer than normal for the first part of the month although the second half of the month air temperatures trended toward colder than normal. This climate information is useful as physical processes influence the timing and duration of hypoxia. Bratton et. al. (2015), Wilson et. al., (2015) and O'Donnell et. al., (2008) note that the frequency of high pressure systems traveling to the North of LIS during the summer months impacts hypoxia, particularly that westerly winds increase stratification and easterly winds reduce stratification.

stratification. CCMP Goals The Long Island Sound Study (LISS) updated the Comprehensive Conservation and

Management Plan (CCMP) for LIS in 2015. One of the four <u>CCMP Goals</u> is to improve water quality by reducing contaminant and nutrient loads to the Sound. To achieve the goals, the LISS identified ecosystem targets and indicators related to <u>hypoxia</u>, <u>nitrogen loading</u>, <u>and water clarity</u>.

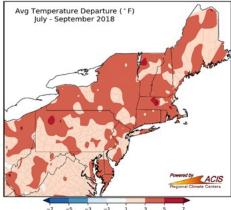


Figure 11. From NRCC. 2018 Average Summer Temperature Departure in PF

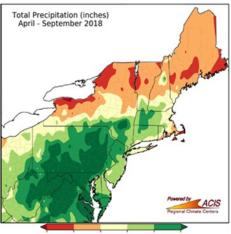


Figure 12. From NRCC. 2018 Northeast Region Total Precipitation

Hypoxia

• The maximum area of hypoxia in the bottom waters of LIS (shall) measurably be reduced from pre-2000 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.

Meeting the ecosystem target for maximum area of hypoxia is ahead of schedule. The LIS pre-2000 baseline for maximum area of hypoxia is 208 square miles. The 2014-2018 five-year running average is 89 square miles (Figure 2). This is a 57% reduction from the pre-TMDL baseline. However, further work is needed to achieve water quality standards and meet the CCMP goal. Considerable variability from year to year still exists and the extent is influenced by weather.

While outside the scope of this report, it would be beneficial to examine each station for attainment of water quality standards with respect to the 3.0 mg/L threshold, as well as the 4.8 mg/L threshold. This would be a better measure of the progress towards DO criteria attainment. Additionally, it would be useful to examine the duration of DO in the 3.0 - 4.8 mg/L tiers at each station and examine the water column profiles at each station.

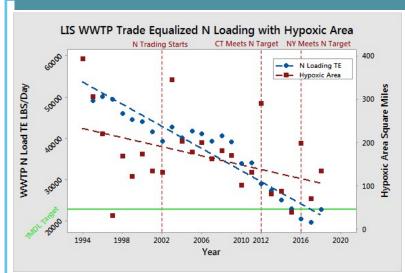


Figure 13. Graph of WWTP Nitrogen Discharge versus Hypoxic Area

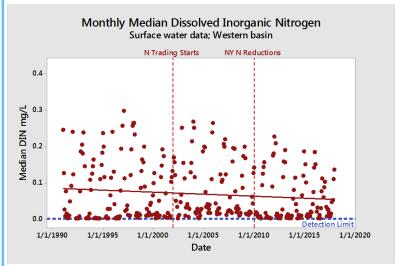


Figure 14. Graph of Monthly Median Surface Dissolved Inorganic Nitrogen Concentrations from Western Long Island Sound

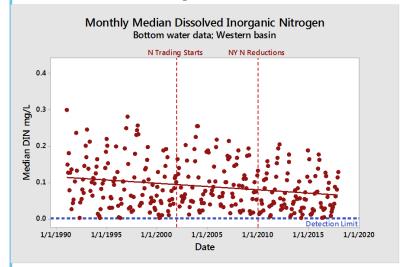


Figure 15. Graph of Monthly Median Surface Dissolved Inorganic Nitrogen Concentrations from Western Long Island Sound

Nitrogen Loading

Another goal of the CCMP relates to point source nitrogen loading from waste water treatment plants (WWTPs). The LIS 2000 Dissolved Oxygen TMDL specifies the primary pollutant contributing to hypoxia in LIS is nitrogen. The major source of nitrogen to LIS are WWTPs, combined sewer overflows, nonpoint sources including stormwater, and atmospheric deposition.

The TMDL requires a 58.5% reduction in nitrogen entering LIS via point source discharges (i.e., WWTPs).

 Attain wastewater treatment facility nitrogen loading at the recommended 2000 Dissolved Oxygen Total Maximum Daily Load allocation level by 2017 and maintain the loading cap. Have all practices and measures installed to attain the allocations for stormwater and nonpoint source inputs from the entire watershed by 2025.

Figure 13 illustrates the downward movement in hypoxic area as well as a downward trend in nitrogen discharges from both NY and CT WWTPs. Connecticut began requiring nitrogen reductions in WWTP discharges in 1998. The CT Nitrogen Trading program began in 2002, and the New York nitrogen reductions began in 2010.

In 2018 the cold, wetter than normal weather decreased the efficiency of nitrogen removal of the treatment systems resulting in an increase in loads to LIS for the first time since 2011. However, the 2018 loading to LIS was still 42 million pounds less than the early 1990s baseline.

Dissolved Inorganic Nitrogen (nitrate + nitrite + ammonia) is the most bioavailable form of nitrogen used by phytoplankton. Figures 14 and 15 illustrate the monthly median concentration of Dissolved Inorganic Nitrogen measured from the surface and bottom waters of western LIS at CT DEEP stations. The general tendency of the data are in a downward direction.

Water Clarity

Improve water clarity by 2035 to support healthy eelgrass communities and attainment of the eelgrass extent target.

Water clarity is a measure of how much light penetrates through the water column of Long Island Sound and is important in nearshore waters for the growth of eelgrass. Eelgrass, *Zostera marina*, is a rooted, underwater grass that provides habitat and protection for fish and invertebrates and food for many migratory birds. Healthy eelgrass beds trap sediment and reduce wave energy during storms, improving water quality and protecting coastal areas from erosion. Eelgrass in Long Island Sound is currently limited to embayments in the far eastern Sound, having disappeared from most of its historic range. Most of the eelgrass in Long Island Sound is found in <4 m

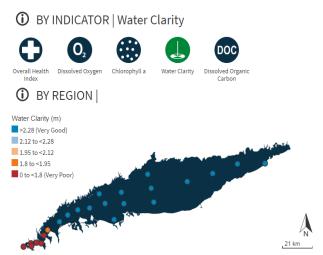


Figure 16. Image form the Long Island Sound Report Card showing station data for the water clarity indicator. Image shows the 2015 data

of water, except where water quality is exceptionally good (i.e. seagrass beds near Fisher's Island). The depth limitation of seagrass in the Eastern Sound is used as the standard by which water clarity is judged throughout the Sound, including areas which do not currently support seagrass.

The CCMP target utilizes 2015 data as the baseline and threshold values developed as part of the Long Island Sound Report Card to track progress (Figure 16). Generally, eelgrass beds need about 22% of the light at the surface to reach the plant; at 3.65 m of total water depth, this equates to a Secchi depth of ~2.4 m. At 1.1 m of total water depth (almost too shallow for eelgrass), this equates to a Secchi depth of ~0.7 m. These two endpoints were used to develop an equation to relate Secchi depth to a score, where <0.7 m gets a 0% and >2.4m gets a 100%. A Secchi depth <1.85 m receives a score of

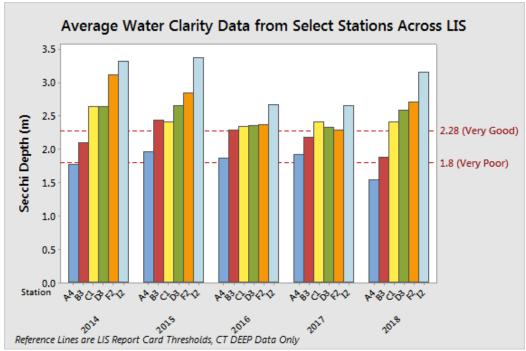


Figure 17. Year round averages of water clarity data from select stations across LIS

<60% (F). Annual average Secchi disk depths greater than 2.28 meters are considered very good while depths less than 1.8 meters are considered very poor.

Generally, with the exception of stations in the western narrows, water clarity across LIS is good (Figure 17). Water clarity in the Western Sound is especially impacted by suspended sediments, organic matter and plankton in the water column.

Future Monitoring Recommendations

Carbonate chemistry parameters

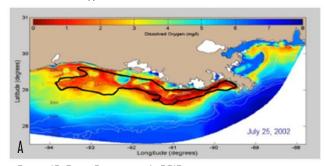
Two of four parameters are needed to describe the seawater carbonate system- pCO2, Dissolved Inorganic Carbon (DIC), alkalinity, and pH, along with temperature and salinity measurements. The CT DEEP and IEC monitoring programs only measure one of these parameters – pH. The LISICOS Western Sound buoy is equipped with a continuous pCO2 sensor. New projects to examine productivity and carbonate chemistry across LIS (The Respire Project, Vlahos 2018 and Shell Day 2019, NECAN) highlight the fact that the LISWQMP and IEC WSMP do not currently collect sufficient data to assess changes to the LIS carbonate system. In March 2018, EPA released <u>quidelines</u> for measuring changes in carbonate chemistry in eastern coastal waters and NOAA presented considerations for managers and developing acidification monitoring programs (Goldsmith et. al., in press). The LISS Science and Technical Advisory Committee should explore options to increase carbonate chemistry analysis as part of the ship based monitoring program.

Embayments

While LIS proper has been well sampled for decades, the embayments across LIS have not. This is beginning to change; the embayments have been recognized as a priority area in the CCMP and the LISS dedicated additional funds for monitoring. The <u>Unified Waters Study</u>, a citizen science based monitoring program, has been successfully implemented by Save the Sound and is in it's third year of sampling. CTDEEP has begun a project to examine the benthic macroinvertebrate communities in embayments as a way to assess the biological community in response to management actions, including nutrient reductions. Data collection activities in embayments to support model calibration will begin in late 2019.

Hypoxia Related Projects

Hypoxia in LIS has typically been reported in terms of area and duration but there may be metrics that could be used. The University of Connecticut and CTDEEP have entered into an agreement to develop tools to calculate and map the hypoxic volume observed across LIS. The project will analyze all existing data, summarize trends related to specific management questions, and develop visual graphics, similar to those in Figure 18, to convey the results to the public. Scavia, et al., (2019) found hypoxic volume is more relevant to the biota than hypoxic area.



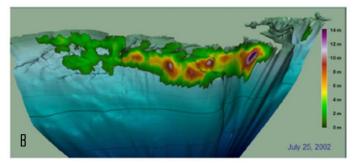


Figure 18. From Scavia et. al., 2019

- A) Graphical representation of hypoxic area in the Gulf of Mexico.
- B) Graphical representation of hypoxic volume in the Gulf of Mexico.

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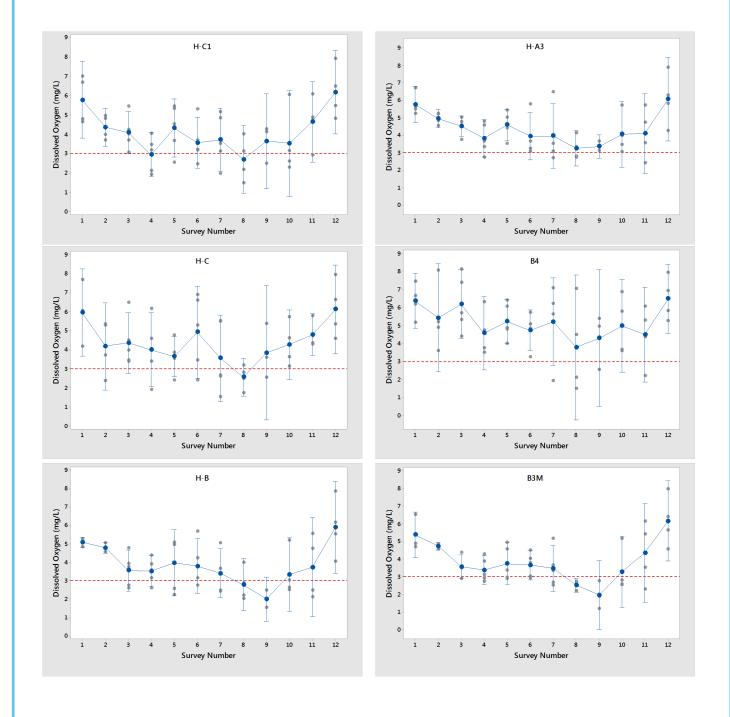
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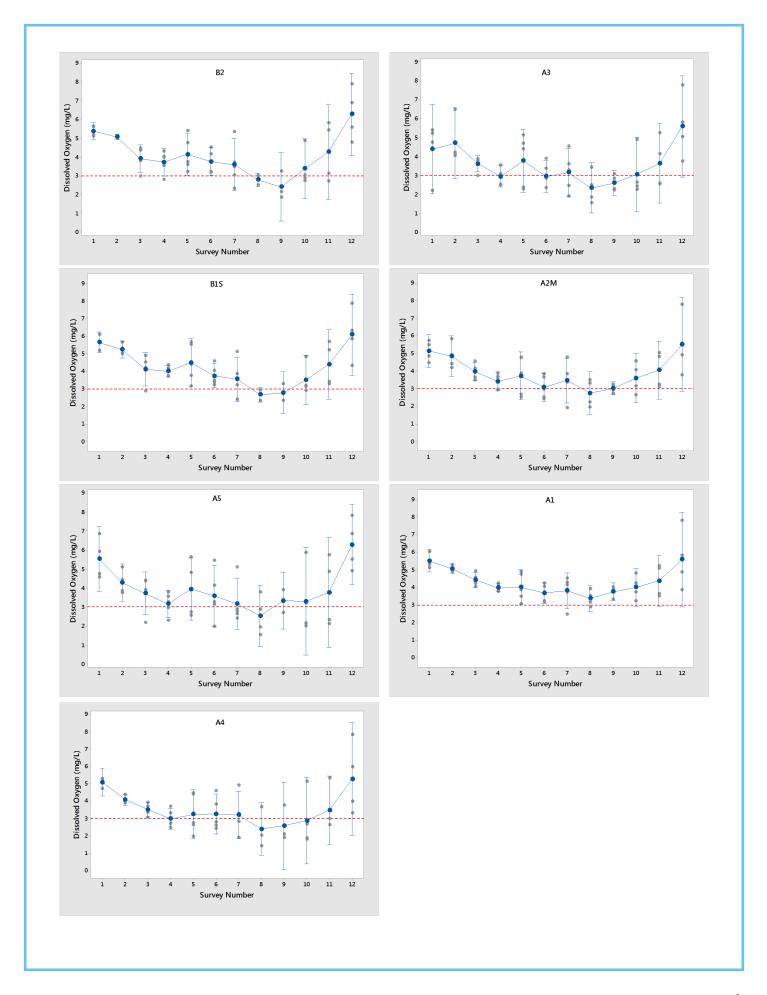
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Appendix A- 2014-2018 IEC Summer Dissolved Oxygen Data

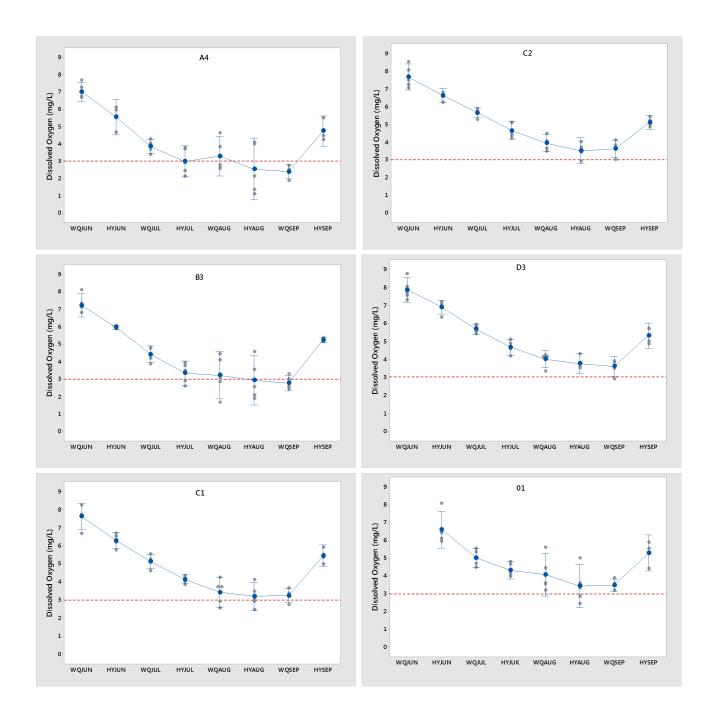
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. See Figure 1 for station locations. The red 3.0 line represents the hypoxia threshold. Data from Survey #1 in 2014 were not included as this survey occurred two weeks earlier than other historic Survey #1s and dissolved oxygen concentrations were greater than 9 mg/L. The lowest DO documented by IEC at an open water station in 2018 was 1.53 mg/L and occurred at Station H-C during Survey #7 on 8/7/18.

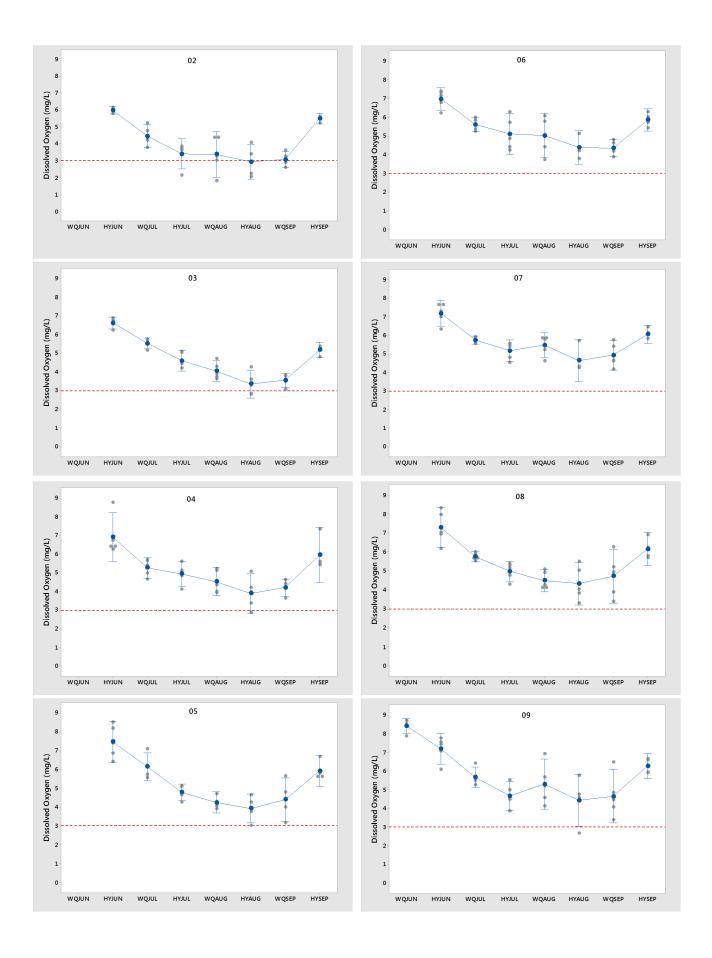




Appendix A- 2014-2018 DEEP Summer Dissolved Oxygen Data

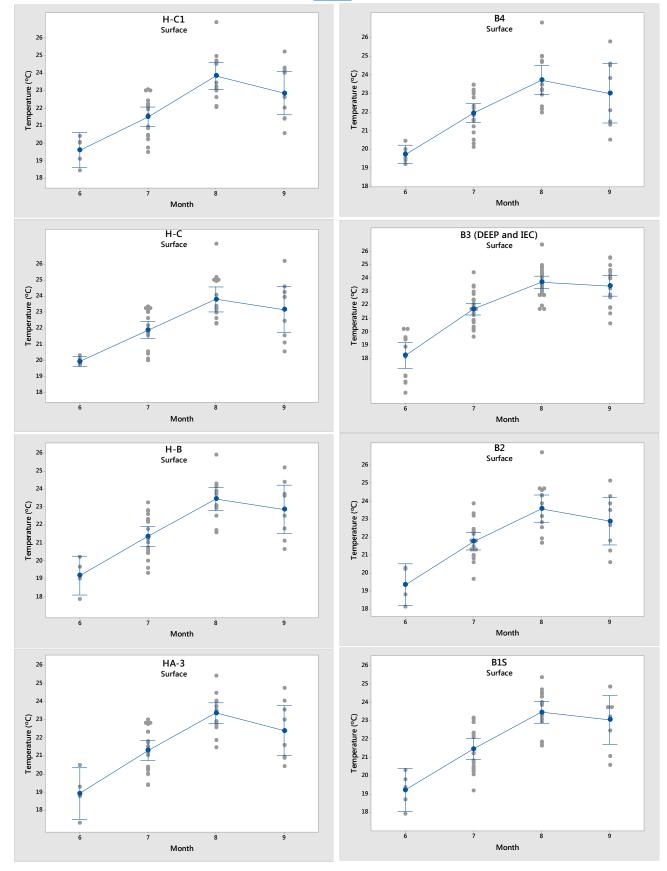
Interval plots showing the mean (), 95% confidence interval (I), and individual data points () by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Data are from stations in western Long Island Sound. Data from all stations are available upon request. See Figure 1 for station locations. The lowest dissolved oxygen concentration measured by CT DEEP in 2018 was 2.34 mg/L and occurred during the WQSEP survey on 8/27/18 at Station A4.

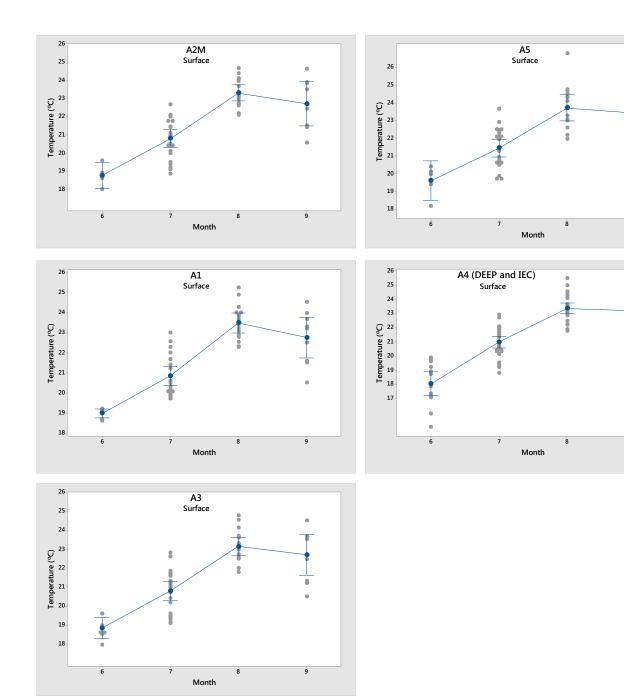




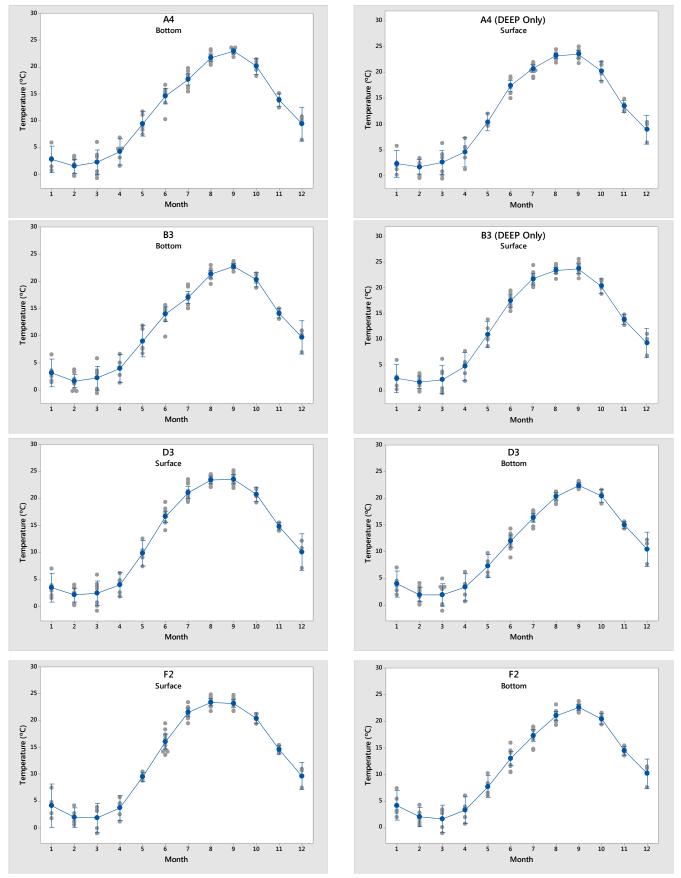
Appendix B- 2014-2018 Summer Surface Temperature Data- DEEP and IEC

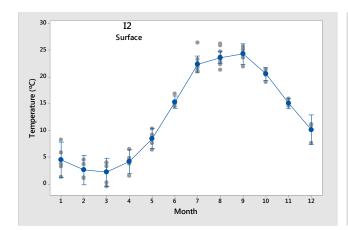
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. See Figure 1 for station locations

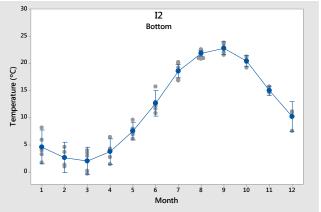




Appendix B- 2014-2018 Year Round Temperature Data, DEEP Only

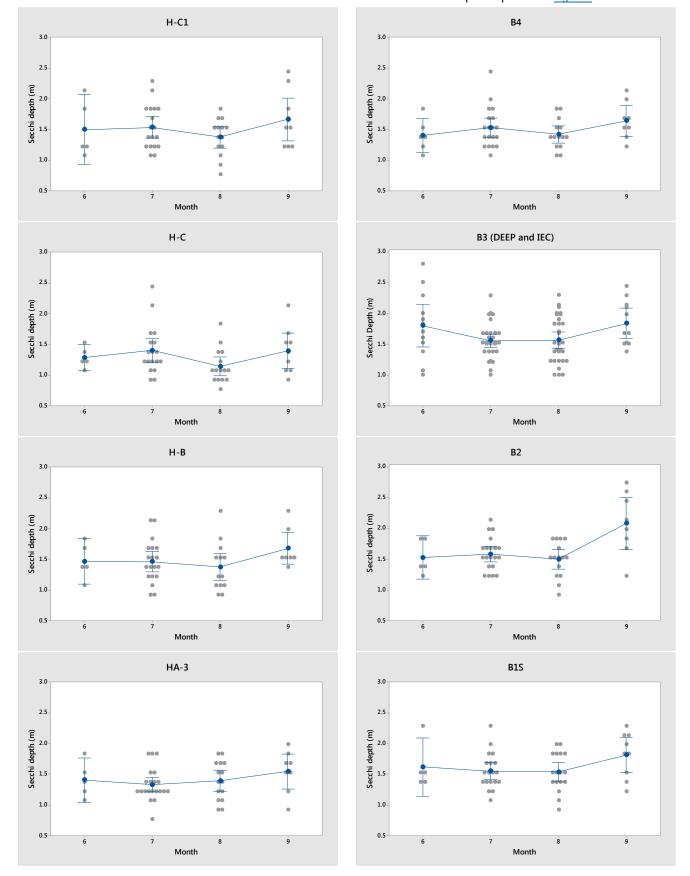


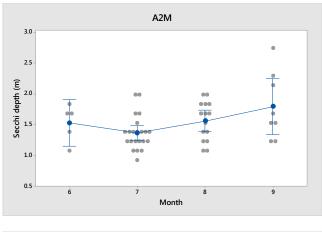


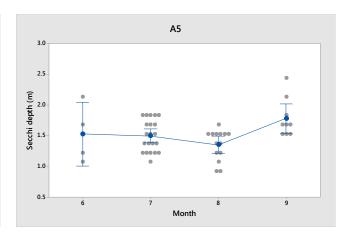


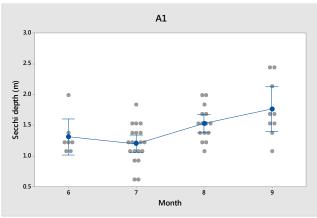
Appendix C- 2014-2018 Summer Water Clarity (Secchi Disk Depth) Data

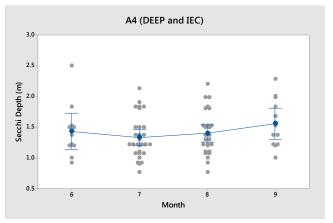
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations

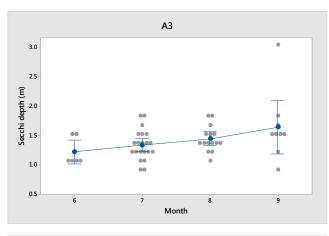


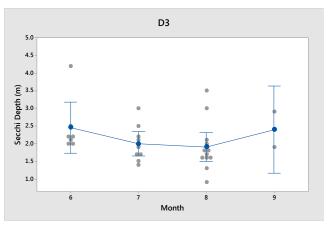


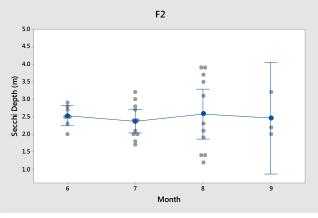


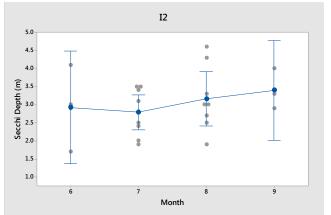






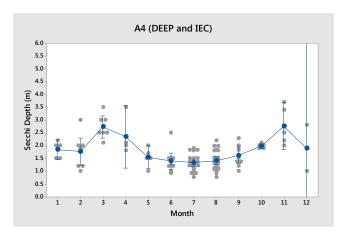


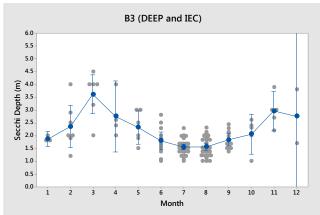


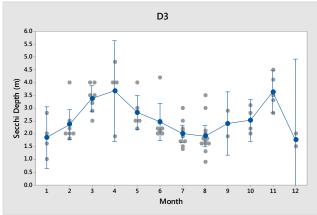


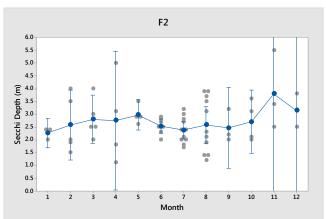
Appendix C- 2014-2018 DEEP Year Round Axial Station Water Clarity (Secchi Disk Depth) Data

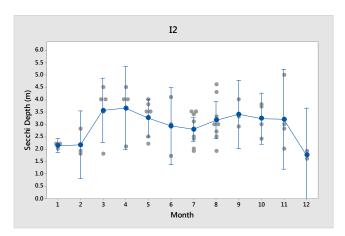
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Graphs for stations A4 and B3 include IEC data collected during the summer months. Data from additional stations are available upon request.





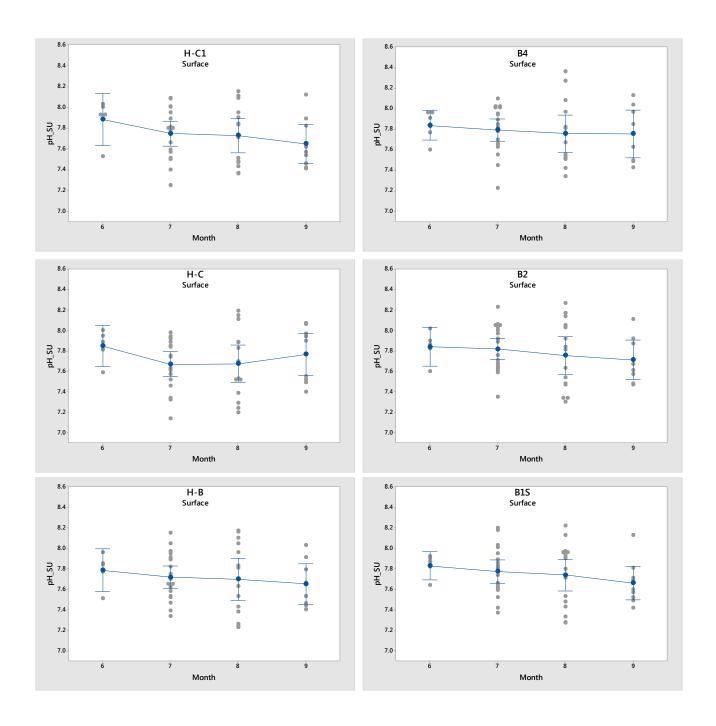


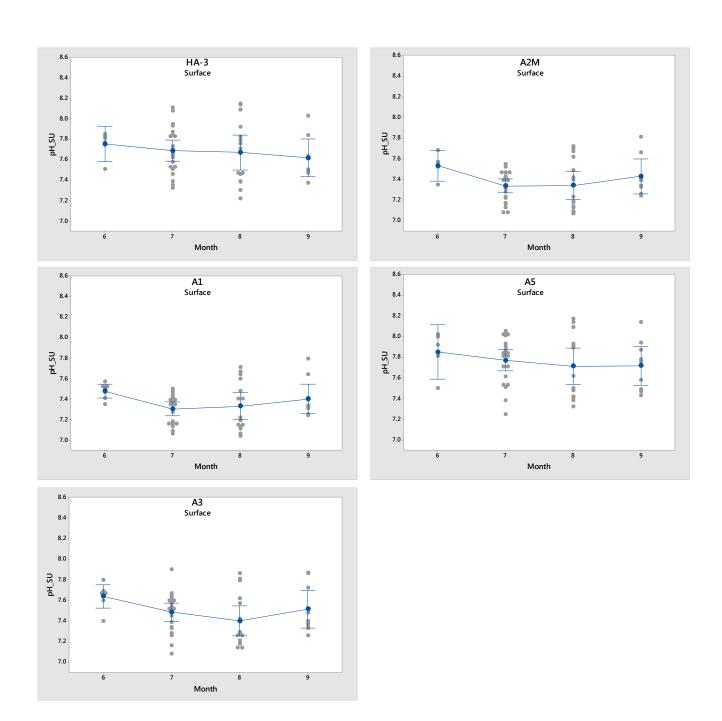




Appendix D- 2014-2018 IEC Summer Surface pH Data

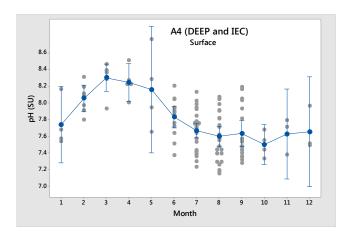
Interval plots showing the mean (•), 95% confidence interval (1), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Bottom data and additional stations are available upon request. See <u>Figure 1</u> for station locations.

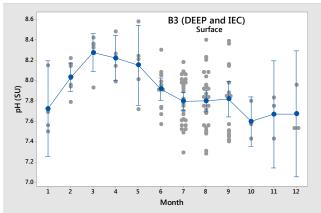


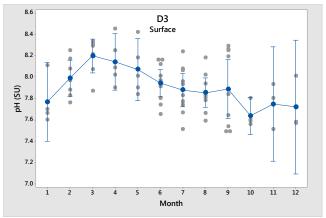


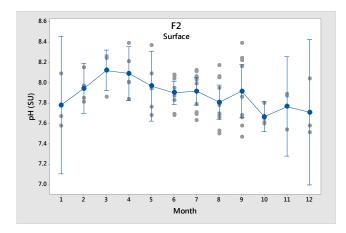
Appendix D- 2014-2018 DEEP Year Round Axial Station Surface pH Data

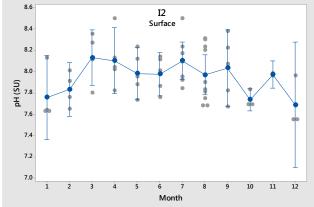
Interval plots showing the mean (), 95% confidence interval (1), and individual data points () by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Graphs for stations A4 and B3 include IEC data collected during the summer months. Bottom data and data from additional stations are available upon request.



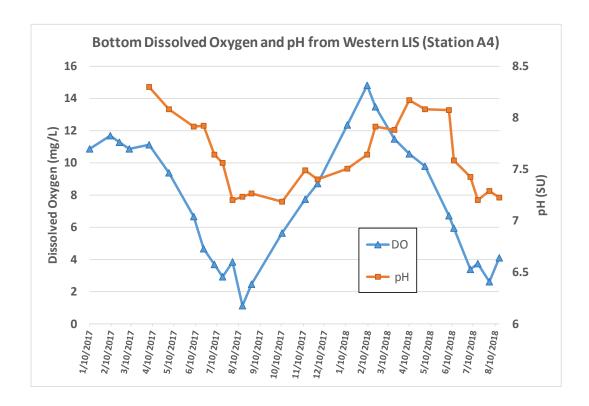






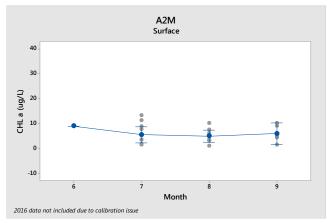


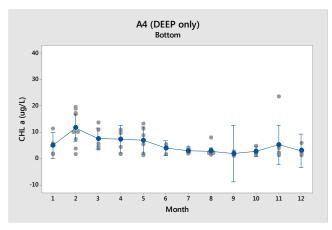
Many LIS stakeholders know that hypoxia is exacerbated by increased nutrient loading into LIS and its embayments. The excess nutrients lead to increased algal biomass. As this biomass dies and decays, oxygen levels decrease contributing to hypoxia. One thing you might not know is that as the organic matter undergoes microbial degradation, carbon dioxide (CO_2) is produced. Excess CO_2 lowers seawater pH and contributes to coastal acidification. The graph below illustrates the decline in bottom water DO_2 concentrations and pH levels at Station A4 from 2017 through 2018. This pattern is evident in other stations across western LIS.

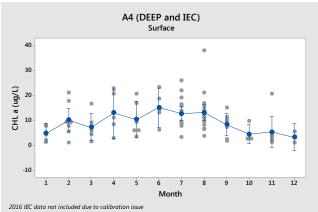


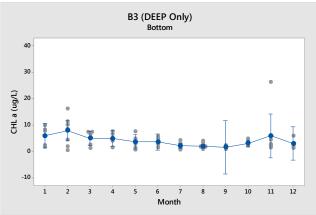
Appendix E- 2014-2018 Chlorophyll Data

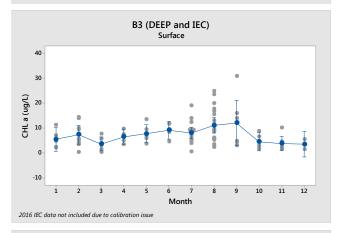
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round.

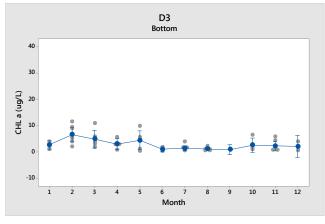


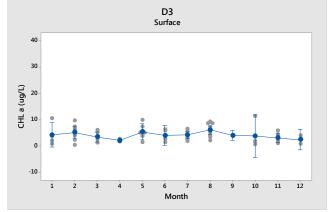


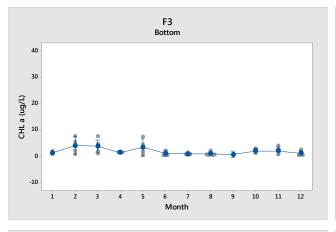


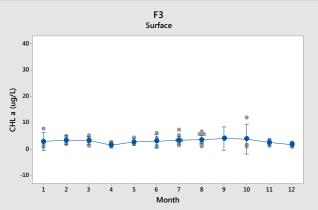


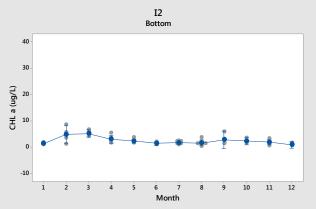


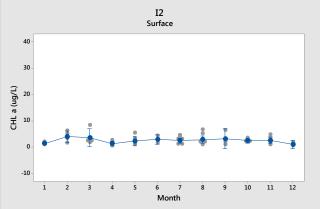






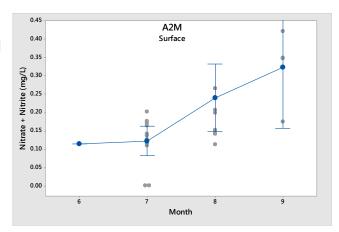


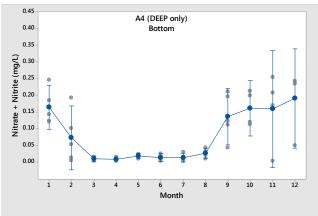


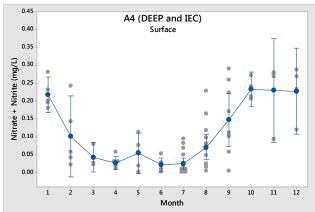


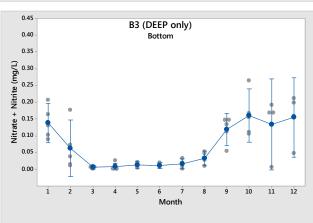
Appendix F- 2014-2018 Nutrient Data- Nitrate + Nitrite

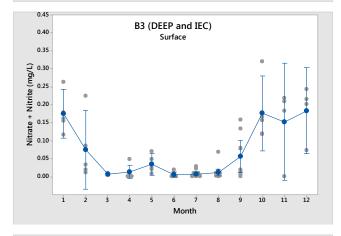
Interval plots showing the mean (), 95% confidence interval (I), and individual data points () by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round.

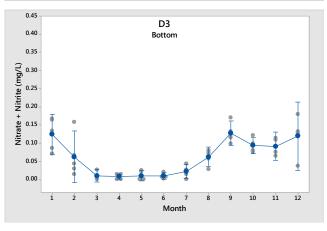


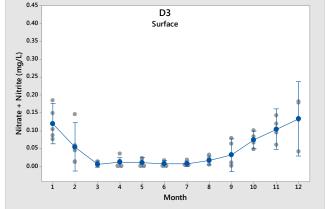


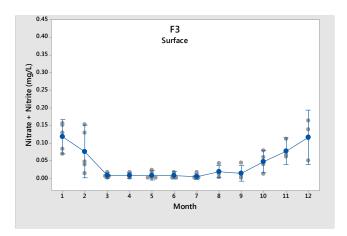


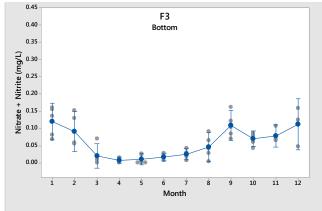


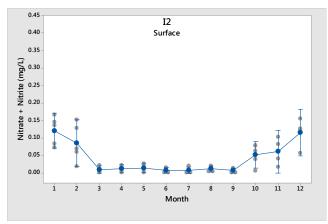


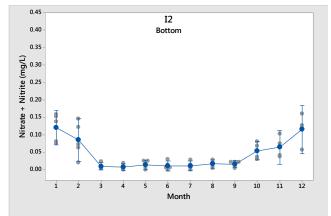






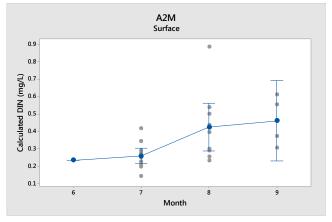


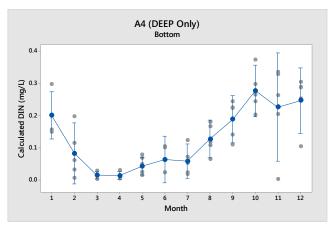


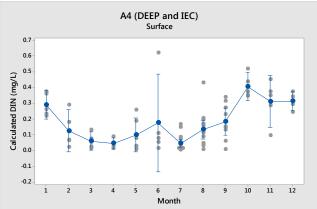


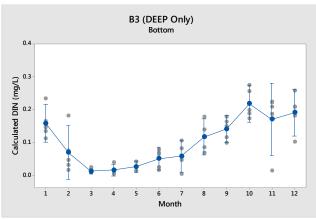
Appendix F- 2014-2018 Nutrient Data- Dissolved Inorganic Nitrogen

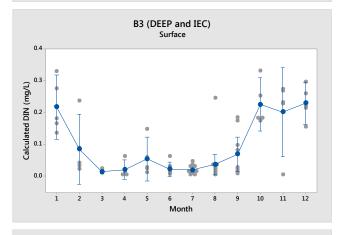
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round. Please note the different scales for Stations A2M and A4. DIN is calculated by adding Nitrate+Nitrite together with Ammonia.

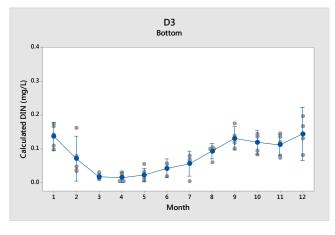


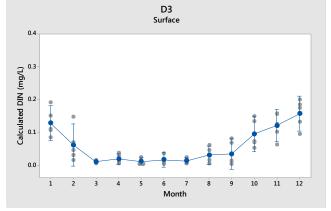


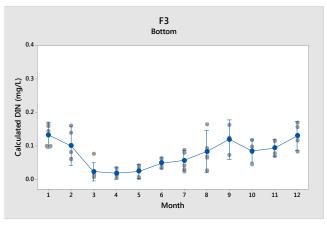


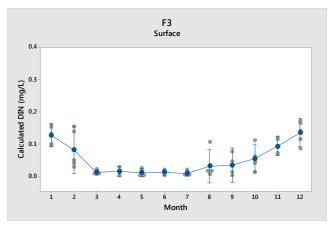


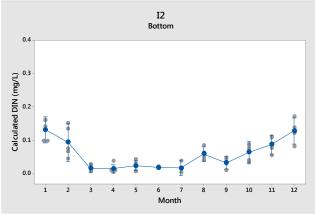


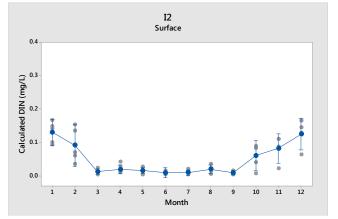






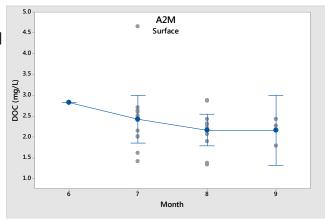


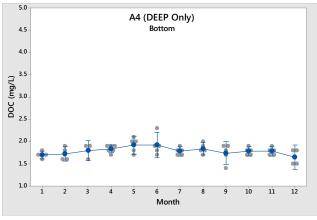


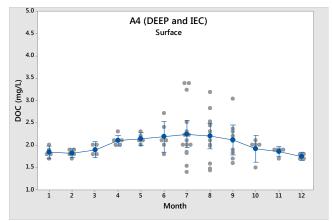


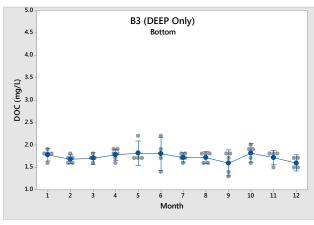
Appendix F- 2014-2018 Nutrient Data- Dissolved Organic Carbon

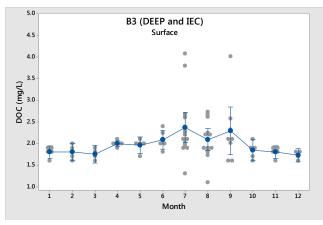
Interval plots showing the mean (), 95% confidence interval (I), and individual data points () by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round.

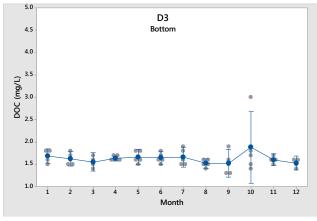


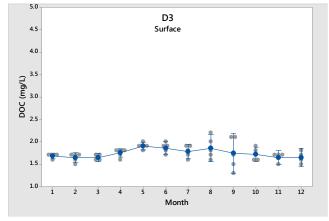


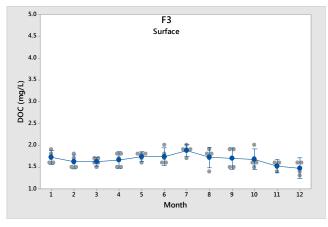


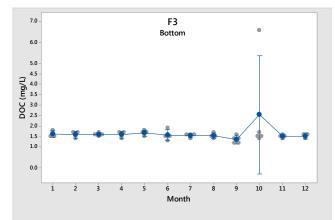


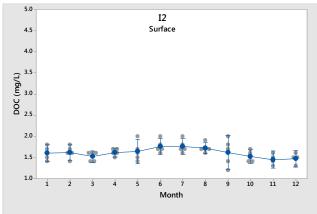


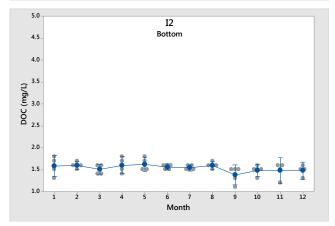






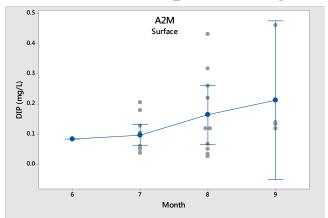


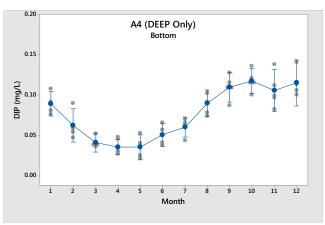


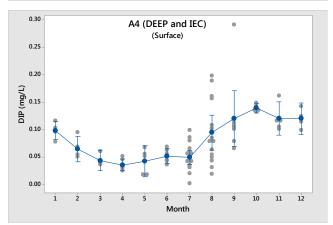


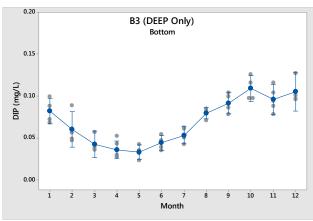
Appendix F- 2014-2018 Nutrient Data -Dissolved Inorganic Phosphate

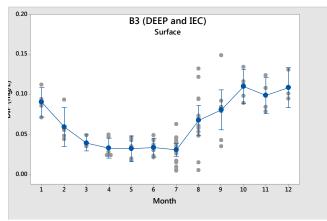
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round.

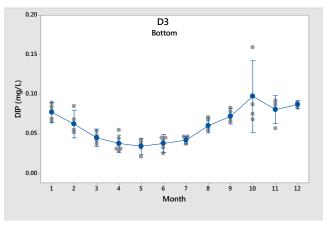


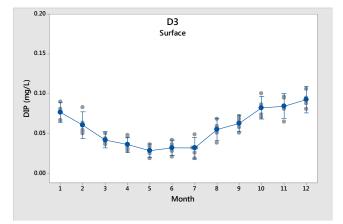


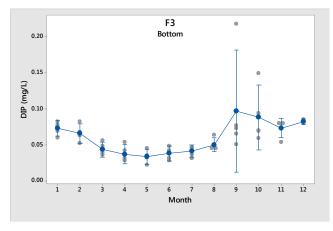


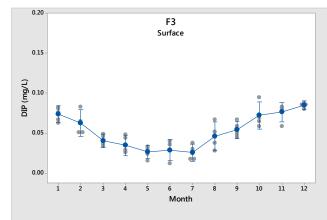


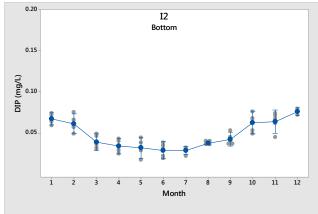


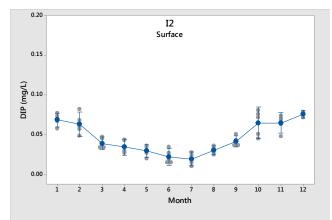






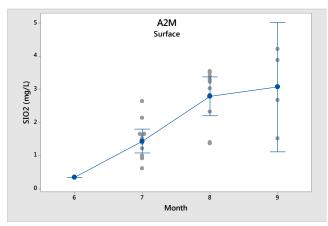


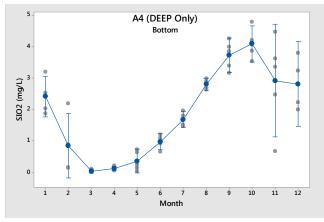


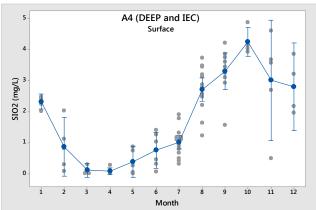


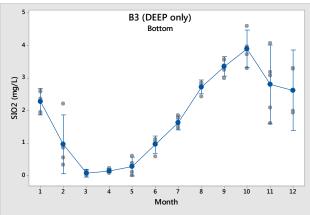
Appendix F- 2014-2018 Nutrient Data - Dissolved Silica

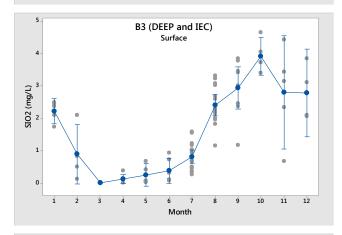
Interval plots showing the mean (•), 95% confidence interval (I), and individual data points (•) by survey from 2014-2018. Individual standard deviations were used to calculate the intervals. Additional stations are available upon request. See Figure 1 for station locations. IEC station A2M is only sampled during the summer months; beginning in October 2018, IEC stations will be sampled year-round.

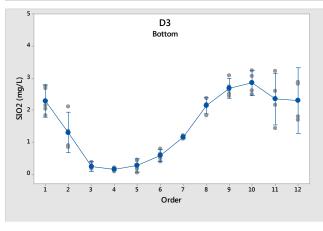


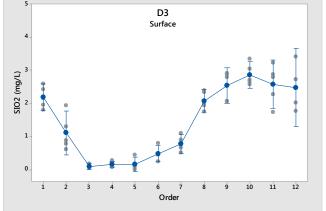


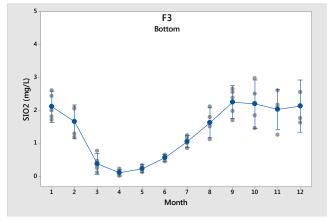


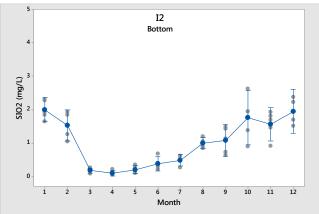


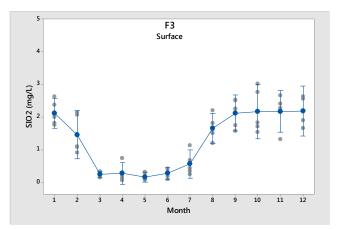


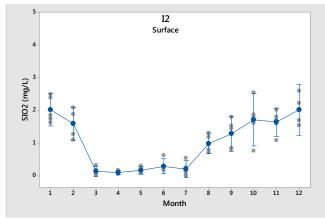












Acknowledgements

Funding for the CT DEEP Long Island Sound Water Quality Monitoring Program and IEC's Western Long Island Sound monitoring program is provided by the Environmental Protection Agency through the Long Island Sound Study.

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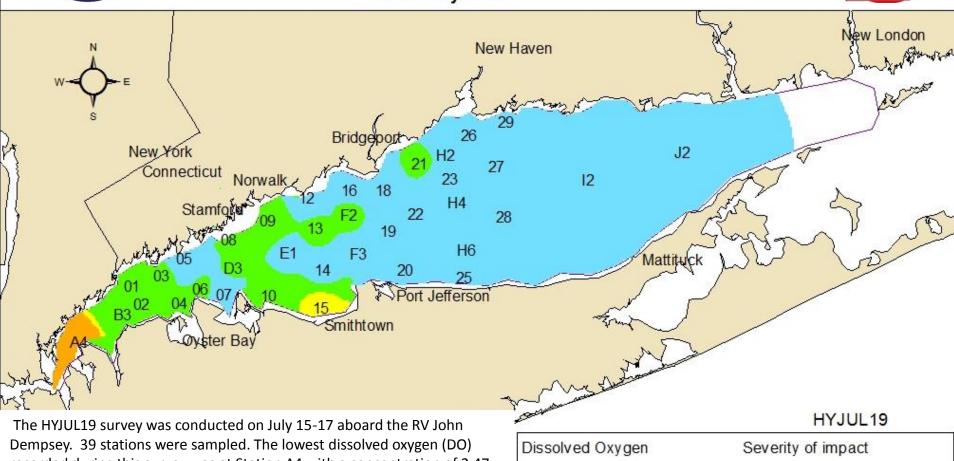






Dissolved Oxygen in Long Island Sound Bottom Waters 15-17 July 2019





The HYJUL19 survey was conducted on July 15-17 aboard the RV John Dempsey. 39 stations were sampled. The lowest dissolved oxygen (DO) recorded during this survey was at Station A4 with a concentration of 2.47 mg/L. The next lowest DO occurred at Station 15 with a concentration of 3.09 mg/L. These numbers are significantly less than during the HYJUL18 survey when the lowest DO was 3.70 mg/L at Station A4. In HYJUL19, Stations A4 and 15 were the only ones below 4 mg/L; however, a total of 26 stations were below 5 mg/L.

During this July's survey, there were 46.1 km2 less than 3.0 mg/L.

Dissolved Oxygen

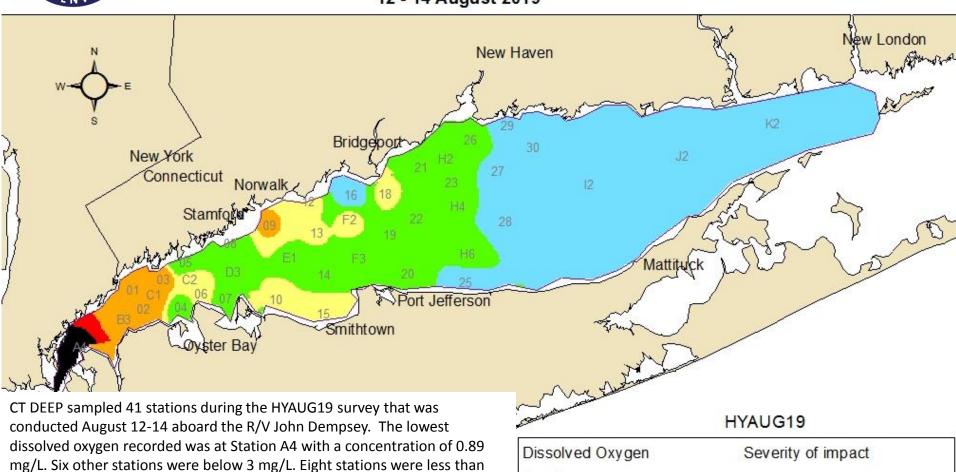
O.0 - 0.99
Severe
1.0 - 1.99
Moderately severe
2.0 - 2.99
Moderate
3.0 - 3.49
Marginal
3.5 - 4.79
Interim management goal
Excellent - Supportive of marine life



Dissolved Oxygen in Long Island Sound Bottom Waters







conducted August 12-14 aboard the R/V John Dempsey. The lowest dissolved oxygen recorded was at Station A4 with a concentration of 0.89 mg/L. Six other stations were below 3 mg/L. Eight stations were less than 3.5 mg/L, and 17 stations were below 4.8 mg/L. The DO at Station A4 during the HYAUG19 survey was below its average (1.93mg/L) and median (1.55 mg/L) values from all HYAUG surveys conducted by CT DEEP between 1998 and 2019. During the HYAUG19 survey, there were 38.2 km2 of bottom water that had DO concentrations less than 1.0 mg/L, 192 km2 of bottom water that had DO concentrations less than 3.0 mg/L.

0.0 - 0.99 Severe 1.0 - 1.99 Moderately severe 2.0 - 2.99 Moderate 3.0 - 3.49 Marginal

3.5 - 4.79 Interim management goal
4.8+ Excellent - Supportive of marine life