



Connecticut Department of

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# Comment Letters on Integrated Water Resource Management as Received by CT DEEP

## List of Comments

*Eric Barz, Town Planner Windsor, 5-31-2016*

I just received Mary-Beth Hart's email and would suggest the Farmington River as a pilot watershed since it now has Wild and Scenic designations for both the upper and lower watershed (with the exception of the Rainbow Reservoir in Windsor) and a significant amount of research has gone into applying for those designations. There may also be opportunities for leveraging Wild and Scenic funding to perform work within the watershed.

Windsor's Plan of Conservation and Development also includes strategies to study and implement utility-scale stormwater management facilities on Farmington River sub-watershed streams in Windsor such as the Mill Brook, Meadow Brook, and Phelps Brook, as we are an MS4 community responsible for the quality of our stormwater discharges. While we take our stormwater seriously, with zero increase in the rate of runoff and other stringent standards on individual sites, the cumulative effect of Windsor's successful economic development program has undoubtedly had an impact on water quality due to prolonged peak flows from so many engineered stormwater systems, not to mention the many older systems going back to the 1950s that are not so well engineered.

Eric Barz  
Town Planner

*DeLoris Curtis, Land Use Administrator, Town Of Southbury, 6-1-2016*

Hi Chris,

I see that a section of the Transylvania Brook south of the Southbury Training School is one of the waterways shown as impaired. That has been the case for some time – I believe as a result of the Training School's failing systems. Now that it is tied into the Heritage Village Sewer system, is that area cleaning up? I thought it was.

Thank you.

*Rod Christie, Executive Director, Mianus River Gorge, 6-8-2016*

Dear Mr Sullivan,

As ED for the Mianus River Gorge I was wondering why the Mianus River Watershed was not selected as a watershed in need of protection. It is the drinking water supply for 130,000 people, has a very productive diadromous fish run and is listed as a AA Special stream. It also contributes water to Long Island Sound in an area where the Sound is significantly degraded. If we are to keep it in good shape, it seems it should be listed. I understand that its watershed is partially in NY, but that should not diminish its value to the State of Ct.

Perhaps you could let me know the selection criteria that were used for this process.

Thank you,  
Rod Christie  
Executive Director

*Peter Cooper, Concerned Citizen, 6-11-2016*

Good Morning,  
I have a suggestion to add to the Plan.

There is a section entitled 'Engagement' which should be augmented. In today's technological environment, the general public is constantly bombarded through all their electronic devices with information of new products or services. In general, water quality is regarded as either something that the public can't do anything about or "the water company deals with that".

I suggest that CTDEEP take another look on how to engage our citizenry and be far more proactive in obtaining widespread engagement. One basic tenet of stormwater management is public education. I suggest that not only can the portion of water impairment attributable to the general populace be reduced through education, but that better understanding of the issues will ease the difficulty of implementing the inevitable expensive solutions, such as creating tertiary treatment of sewage. Because the electronic noise is so pervasive, the education will need to be delivered through several popular media and over a period of years.

Thank you for considering my suggestion, Peter Cooper

*Louise Washer, Norwalk River Watershed Association, 6-17-2016*

Dear Mr. Sullivan,

I am writing on behalf of the Norwalk River Watershed Association (NRWA) to support the proposed selection of the Norwalk River and the Norwalk Harbor embayment as candidates for water quality restoration work as part of Connecticut's Integrated Water Resource Management Plan.

The Norwalk River watershed faces many challenges to water quality. In addition to the 4 waste water treatment plants along the river and leakage from old septic systems, it absorbs storm water runoff from Route 7, which runs the length of the river, and from the densely developed commercial corridor which lines it. The watershed community has come together to address these problems, however, and represents one of the earliest community-driven initiatives in the country to restore and protect watershed resources.

The year-round monitoring of water quality in the Norwalk River by Harbor Watch and The Norwalk River Watershed Action Plan, created in 1998 and updated in 2011, guide and support the work of a dedicated and active group of volunteers from the community. This team is organized and ready to work with the State to help restore water quality and fish and wildlife habitat in the area.

In the last year alone, NRWA has worked with the Norwalk River Watershed Initiative, Harbor Watch, Trout Unlimited Mianus Chapter, Hudson to Housatonic Regional Conservation Partnership, scout troops, high school students, the land trusts and the conservation commissions in the seven watershed towns, town governments, area businesses and its team of community volunteers to protect and restore the watershed. NRWA works with these groups to sponsor riverbank cleanups and restoration through invasive plant species abatement and the planting of native plants as well as educational walks and talks. NRWA connects the community to the open space and waterways of the watershed by publishing a trail map of the area which it is updating this year with a grant from REI Norwalk. NRWA is currently working with NRWI and the town of Wilton to mitigate the storm water runoff from the road and parking lot at a town park, which currently drains directly into the river. Volunteers will help install rain gardens as well as lay pervious pavement and install a bio-swale between the parking lot and the river. In May NRWA hosted a talk by the director of Harbor Watch updating the community on changes in water quality in the Norwalk River and fish populations in Norwalk Harbor.

This is the sort of community involvement and activism we at NRWA are proud to be part of. We look forward to collaborating with the State on similar projects in the future to make a substantive difference in the water quality and fish and wildlife habitat in our watershed.

Thank you,  
Louise Washer  
President, Norwalk River Watershed Association

*Nancy Alderman, Quinnipiac River Granting Fund, 6-21-2016*

Comments from Nancy Alderman, Quinnipiac River Granting Fund, Community Foundation of Greater New Haven

1. The end date of the plan seems extraordinarily far away-2022-perhaps too far away and should be shortened.
2. The Quinnipiac River, often spoken of as the Q river, was designated a "dirty river" many years ago and therefore industries were allowed to build, manufacture and discharge their wastes into that river. This river needs the help of government if it is to ever be cleaned up. Permits need to be tightened and enforced. We cannot clean the Q River as long as industry is allowed to dump tons of toxins into it. This issue needs to be addressed.

Nancy Alderman

*John Hudak, Regional Water Authority, 6-22-2016*

Dear Mr. Sullivan:

The South Central Connecticut Regional Water Authority (RWA) is a non-profit, public corporation and political subdivision of the state. Our mission is to provide our customers with high quality water at a reasonable cost while promoting the preservation of watershed land and aquifers. We provide approximately 48 million gallons of water per day to some 430,000 consumers in 15 communities in our region. The source of this water is a system of watershed and aquifer areas that cover about 120 square miles within 24 municipalities. We own 27,000

acres of land, the vast majority of which is managed for watershed protection, timber resource conservation, wildlife habitat, open space, education, and research.

To ensure the delivery of high quality drinking water to our customers, the RWA utilizes a multi-barrier approach that includes source water protection, treatment, distribution system integrity, and monitoring. Our source water protection program includes acquiring critical lands for protection, watershed and aquifer inspections, site plan reviews of proposed development projects, constructed stormwater wetlands projects, and working with our watershed municipalities to enact land use regulations protective of drinking water sources.

We have reviewed the Department of Energy and Environmental Protection's (DEEP) new Integrated Water Resource Management approach. The RWA recognizes that successful protection of its water sources is most effectively accomplished by pooling resources from multiple stakeholders, such as local, regional, and state government, nonprofit groups, land trusts, businesses, and developers. We are thus encouraged that the Integrated Water Resource Management framework includes building on local partnerships, as well as benefitting from prior work generated concerning water quality issues pertaining to specific watersheds.

Watersheds or aquifers containing sources of drinking water for the RWA's region are contained within three of the CT DEEP's "Preliminary Waters for Action Plan Development": the Farm River, the Quinnipiac River, and the West River. The source water quality issues facing these watersheds are quite different, and the RWA has much knowledge and expertise to lend to future planning and management efforts. For example, the Farm River is highly vulnerable to excessive nutrient loading from agricultural and suburban land use, which can lead to nuisance algae and cyanobacterial blooms in our downstream drinking water reservoir. We have invested much effort over many years in protecting the aquifer along the Quinnipiac River, which provides drinking water to our customers in the northern area of Cheshire. This includes cooperative efforts with the town of Cheshire and DEEP in adopting and implementing aquifer protection regulations. Although the water supply portion of the West River watershed is highly forested and protected, with about 55 percent in RWA ownership, there are water quality vulnerabilities to be managed involving climate change, implementation of stream flow regulations, suburban development, and impacts of road deicing practices.

The RWA stands ready to be an active participant in future Integrated Water Resource Management efforts affecting our region. Thank you for the opportunity to comment on this program. If you have any questions, please contact me at XXXXXXXXXX.

Sincerely,  
John P Hudak  
Environmental Planning Manager

*Alicia Mozian, Conservation Director, Town of Westport, 6-24-2016*

Dear Mr. Sullivan:

The Town of Westport has two waterbodies listed for consideration in the proposed Integrated Water Resource Management report for development of a water quality action plan. These are the Saugatuck River Estuary and Sasco Brook which forms a partial border with Fairfield. This

letter serves as support for inclusion of these two waterbodies and their entire watersheds in the plan. Inclusion will help us to build upon all which we have accomplished thus far in helping to improve these waterways but which there is so much more to do.

### **Sasco Brook**

The Sasco Brook Pollution Abatement Committee consisting of representatives from Westport, Fairfield, Westport-Weston Health District, NRCS, DEEP, Southwest Conservation District, and Harbor Watch, is actively working to implement a watershed based plan which was approved by DEEP in 2012, as well as two TMDLs (1999 and 2005) produced by DEEP . This watershed plan brings together the efforts that the Sasco Brook Pollution Abatement Committee has been working on for more than 20 years, when it was first formed to address the problems in the stream that were adversely affecting recreational shellfish beds at its mouth. We believe that the cumulative actions of the watershed stakeholders have improved the water quality of the brook so that it is very close to meeting its goals. We would deeply appreciate any support that DEEP can provide to getting us over the finish line to fully support designated uses. It is the belief of all the members of the Sasco Brook Pollution Abatement Committee that prioritizing the entire watershed will help to keep the municipalities, the stakeholders, and the general public committed to helping us reach full support for designated uses.

We have made many strides over the years to improve the health of the stream, so much so that it was delisted for aquatic life use support for fish but still does not meet swimmable standards. There are many examples of how the Towns and watershed stakeholders have dedicated significant resources. These include the expansion of sewers to the more vulnerable areas in the watershed, very costly privately-funded efforts to treat and prevent pollution in stormwater discharge from a local equestrian hunt club, workshops, and door-to-door education campaigns. The Westport Weston Health District has embarked on an ambitious DEEP 319 supported project to use innovative PCR technology in partnership with Yale, CT Agricultural Experiment Station, and Harbor Watch to study microbial source tracking to better ascertain the sources of high E. Coli counts and determine species from which the fecal bacteria originate. This is indication of strong local support for pinpointing how we can attain our goals. The study was designed to also provide other municipalities and health departments with transferrable technology and more informed guidance on source tracking. Sasco Brook was chosen by NRCS and DEEP as one of the first collaborative watershed partnerships due to high stakeholder interest and capacity as well as the lack of point sources of pollution. We are still working hard to clean up sources of pollution.

In reviewing the actions that the EPA and the DEEP are taking to improve effectiveness of a water quality action plan, Sasco Brook is one that would greatly benefit by the actions but also demonstrates that some of these actions have already been taken. For example, “Reviewing information to choose waterbodies with the most likely successful restoration potential” is an action we have already seen that has yielded progress because bacteria and nutrient levels have come down to meet fishable standards.

Another action is “Building on existing partnerships.” We have partnered with CT DEEP, the Town of Fairfield, the CT Bureau of Aquaculture, the Southwest Conservation District and the Natural Resources Conservation Service and the Fairfield County Hunt Club for the last 20 years in working to improve this watercourse.

Clearly, including all segments of Sasco Brook on the Integrated Water Resource Management (IWRM) list of waterbodies for which a water quality action plan is not only a good thing to do, it will prove to be cost-effective. We have made large strides in the last 20 years, to stop now would be to fall short of the ultimate goal to get this brook removed from the impaired waters list. Prioritization by the IWRM process may lead to funding to help us continue to employ what actions have worked and to develop even more things that we can do to improve the watercourse.

### **Saugatuck Estuary**

A watershed management plan was written by the Southwest Regional Planning Agency (a/k/a WestCOG) and has been approved by the CT DEEP. However, prior to that, the development of a plan was first initiated by The Nature Conservancy in 2006 when all 11 community leaders in the watershed signed a compact pledging to work to improve the water quality of the River. As with Sasco Brook, having the estuary on the list will inevitably lead to further action steps to improve the water quality of the River. The Nature Conservancy continues to focus on the estuary as part of its effort to reduce nitrogen in Long Island Sound. Part of the reason they chose to focus on the estuary was because there were already active partners and an engaged community whereby introducing new actions would most likely be supported.

The Saugatuck estuary contains an active commercial and recreational shellfishing area which is worth millions to the state’s economy. The Town has spent millions upgrading its sewage treatment plant to an ionization plant to better treat nitrogen and expand the sewer into the most vulnerable neighborhood, Saugatuck Shores, all of which is subject to regular flooding events. The federal navigation channel of the Saugatuck River is also being reviewed by the Army Corps of Engineers for issuance of a dredging permit. Keeping the estuary on the list will help us continue the good work we are already doing to improve the health of this incredibly important resource to our town, the state and to Long Island Sound.

In summary, we are writing to support the inclusion of the Saugatuck Estuary and Sasco Brook among the list of waterbodies for which an Integrated Water Resource Management action plan may be developed in order to aide us in continuing our efforts to improve the health of these valuable resources in our community.

Thank you for the opportunity to comment.

Sincerely,  
Alicia Mozian  
Conservation Director

*Scott Randall, Concerned Sherman Resident, 6-28-2016*

Good afternoon,

Please consider adding Candlewood Lake to the Integrated Water Resource Management program.

Candlewood Lake is the State's largest inland Lake and is heavily used by a diverse cross section of residents be they fisherman, boaters, swimmers or nature lovers. The Lake is accessed by two State launches, at least five Town ramps and numerous private facilities.

By nature of ownership of the Lake bottom by FirstLight and the fact that the Lake is bordered by five Towns (Brookfield, Danbury, New Fairfield, New Milford and Sherman), the Lake would benefit greatly from increased State involvement and coordination. Simply put, the complexity inherent in Candlewood necessitates that many of the challenges facing Candlewood are best coordinated at the State level - a key design element of the program. As things stand today, each Town's approach towards Lake/shoreline management is very different with the result that there exist significant gaps in best management practices from Town to Town. FirstLight, although chartered by FERC to manage the "environmental, recreational and power generating aspects" of the Lake looks to others to take the lead on addressing water quality concerns. The Candlewood Lake Authority does an outstanding job on managing many aspects of the Lake and would be the ideal liaison between the State and other stakeholders.

Candlewood Lake is showing signs of increasing stress. The Lake experienced cyanobacteria blooms in 2013, 2015 and as recently as last week. This provides proof positive that current nutrient levels are and will continue to cause issues. Multiple beach closures have occurred at both Town and State facilities. Given the recency of these cyanobacteria blooms and closures, I wonder if the State's scoring metrics accurately reflect these events.

Candlewood Lake is the key economic engine for this region. A healthy Candlewood will benefit State, Town and Federal finances as well as being a huge quality-of-life factor that attracts (and keeps) many in the area.

Regards,

Scott Randall

*Carl J. Amento, Executive Director, SCRCOG, 6-29-2016*

Dear Mr. Sullivan

The South Central Regional Council of Governments (SCRCOG) wishes to express its interest in partnering with the Connecticut Department of Energy and Environmental Protection (DEEP) on the Integrated Water Resource Management Program. SCRCOG has recently been awarded a grant from the Connecticut Institute on Resiliency and Climate Adaptation (CIRCA) which will allow us to partner with the South Central Regional Water Authority (RWA) and several University of Connecticut scientists on a study of the effects of climate change on public drinking water quality and supply in our region. SCRCOG is also a member of the Central Corridor Water Utility Coordinating Committee (WUCC). SCRCOG was awarded a \$700,000 grant from the National Fish and Wildlife Foundation to develop a Framework for Coastal Resilience for 10 municipalities along Long Island Sound. The project, which involves crafting green infrastructure and hybrid solutions, is being conducted in conjunction with The Nature



Conservancy and the CT Metropolitan Council of Governments (Bridgeport region). SCRCOG plans to continue its collaboration with the RWA in other studies of drinking water and watersheds in the region. We will be beginning our next Regional Plan of Conservation and Development this year, as well as a Multi-Jurisdictional Hazard Mitigation Plan update.

SCRCOG intends to organize a regional Stormwater Working Group this year to coordinate technical assistance, cooperative purchasing, and regional-scale planning to assist our fifteen member municipalities with compliance with the new MS4 permit requirements. In particular, SCRCOG has developed a regional Geographic Information System program which can provide mapping assistance to all of the aforementioned projects. As an outgrowth of our regional GIS program, SCRCOG has developed a Regional Recreational Trails Program, which provides detailed mapping and helpful information about recreational trails in our region, many of which follow river and stream corridors.

In summary, SCRCOG has developed and will continue to develop a strong commitment to the protection of rivers and watersheds in our region. Our planned work on watersheds will complement our existing work in the area of coastal resilience. We are planning to partner with the RWA, local watershed organizations, our member municipalities, water scientists at UConn and Yale, and non-profit environmental organizations such as River Advocates of South Central Connecticut in developing a central repository of reports and studies of the major rivers and watersheds in our region.

Together with our collaborators, we would like to assemble existing studies, assess the combined resources we can bring together, identify gaps in our knowledge and understanding of our region's rivers and watersheds, and marshal resources to fill those gaps. Ultimately, we hope to develop action plans to protect and foster the health of our region's water resources for drinking and recreational enjoyment. We would like DEEP to partner with us in our initiatives, and we would like to commit SCRCOG's resources and that of our collaborators to partnering with DEEP in its water programming in our region.

We are pleased to see that DEEP has preliminarily identified 3 major watersheds in our region, the West River, Quinnipiac River, and the Farm River Watersheds, for further studies. We respectfully suggest that DEEP consider including the Mill River among the watersheds that it will study.

Thank you for this opportunity to express SCRCOG's interest in partnering with DEEP and to comment on DEEP's preliminary identifications of watersheds to be included in the Integrated Water Resource Management Program.

Best regards,  
Carl Amento  
Executive Director

*Alison Hilding, Concerned Mansfield Resident, 6-29-2016*

Dear Mr. Sullivan,

I am writing regarding the opportunity to comment on the State of CT Integrated Water Management Plan.

I would like to ask that the Cedar Swamp Brook, the Nelson Brook, and the Weaver Brook, all tributaries to the Willimantic River and within town of Mansfield, be included in the state's Integrated Water Management Plan.

These three brooks stand to be negatively impacted by the development intended for the 500 acre area known as "Four Corners" in Mansfield which will shortly be provided with public sewer and water thereby enabling considerable commercial growth in this area. The sewer project will be receiving \$3 million dollars in state funds matched by \$9 million in town funding. Much of the current pressure for growth in Mansfield is related to the presence of the University of Connecticut in Mansfield. We host over 20,000 students every year and our natural resources suffer for our hospitality. Since we host so many CT residents from around the state at the university and in our town, it would seem appropriate for the state to support us in both restoring and protecting our rivers and streams.

The Cedar Swamp Brook currently has an elevated bacteria level in one section. I note that the Cedar Swamp, (which converges with the Nelson Brook at Birch Road) was dammed at Bone Mill Road in 1919 to create a drinking water reservoir for UCONN and the Mansfield State Training School. This brook and the reservoir it fed remained the drinking water source for these two institutions until the Fenton River wells came on-line in 1938. Parts of the Bone Mill Road system were still pressurized to the Depot Campus until the early 1990's. The Cedar Swamp Brook was once so pure and abundant as to be a drinking water source. A stream of this quality and value surely should be restored and protected.

We have seen the damage caused to the Eagleville Brook by the development over the years on the UCONN main campus. The TMDL the State has engaged in to restore this brook has been fabulous and much appreciated in this community. I hope that the Eagleville Brook, another tributary to the Willimantic River, will also be included in the Integrated Water Resource Management Plan and that care for its continued improvement will be provided over the long term by the state.

The Willimantic River is the recipient for the effluence from the UCONN sewage treatment plant. It will be further burdened by the increase in treated sewage as a result of the expanded sewer service area at the Mansfield Four Corners as well as continued growth at UCONN. It seems therefore prudent and responsible to ensure that the tributaries to the Willimantic achieve and contribute water of optimal quality. While there is attention to and concern by the State for the bacteria issues upstream in the Willimantic River, it would seem a sound comprehensive approach to address the complete water system of the Willimantic, including its tributaries which are burdened by existing development and threatened by increased development within the town of Mansfield and at the University of Connecticut.

Thank you for this opportunity to comment. Would you kindly confirm receipt of this email?

I note that I am a member of the CT Council on Environmental Quality and that I am writing the note as a private citizen and do not represent the Council in this communication.

Sincerely,

Alison Hilding

*Margaret Miner, Executive Director, Rivers Alliance, 6-29-2016*

Mr. Christopher Sullivan

Comments from Rivers Alliance of CT regarding the Integrated Water Resource Management project.

Thank you for presenting the Integrated Water Resource Management (IWRM) Vision for moving toward more effective implementation of the Clean Water Act (CWA) in Connecticut. Rivers Alliance has signed on to the important comments from the Long Island Sound Study Citizens Advisory Committee (CAC), of which we are a member. We also support comments we have seen from Housatonic Valley Association (HVA). And we share interest in questions we have seen from Park Watershed.

We support the emphasis on prioritization and the inclusion of protection with restoration as twin goals.

We see opportunities for coordinating the IWRM with the Integrated Water Quality Report due in 2016 as per the CWA. That report includes the 305(b) and 303(d) lists, that is, evaluative listing of all state waters and impaired waters, as well as action planning for Total Maximum Daily Loads (TMDLs) and other measures for water quality improvement. When will this 2016 report be appearing? I gather DEEP has been using data and other information from the 2014 report for the IWRM. So updating may be required when both documents are released.

The welcome emphasis on protection in the IWRM appears to reintroduce in many cases a former 305(b) designation: Threatened Waters. Rivers Alliance has repeatedly asked that the Threatened Waters designation be brought back because it is so important to know where prompt protective action might reverse a decline into impairment. Happily, in the IWRM analysis of protection needs, you have the data to substantiate Threatened Waters designations. So we ask that Threatened Waters be reinstated in the 2016 Report.

Along with a number of our colleagues, we are unhappy with the very, very lengthy process envisioned in the IWRM for ongoing planning as contrasted with few specifics and virtually no timeline for action. We understand that DEEP's resources are limited, but that is all the more reason to allocate them more evenly between planning and implementation. The public is getting mixed CWA messages. Under the 319 program we are told these days: "no money for planning, only for implementation." Under the Vision, we are told: "keep planning."

CAC offers good recommendations for ways DEEP can use its various authorities to support the goals in the IWRM. An example of the kind of situation in which the Vision could be applied is the power plant project in Oxford. Here, the proposal for a water cooling technology clearly was going to stress a watershed where there was ample, strong science showing flow impairment and ecological harm. Under the Vision, we hope DEEP will communicate with the Siting Council and others as appropriate about how to avoid deeper impairments. (One alternative might be air cooling or a hybrid system.)

We strongly recommend using thermal pollution as an indicator of impairment, and healthy thermal numbers as indicators of potential high quality. Connecticut already has excellent, scientific thermal data. It is also one of the easiest measures for citizen scientists to master. Thermal metrics have broad applicability, and are especially important to developing resilience in response to climate change. The data is relatively inexpensive to gather and outstandingly cost effective.

An impairment associated with thermal pollution is low stream flow and aquifer depletion. Thank you for IWRM's attention to free-flowing streams and altered streamflow. We ask that you increase attention to groundwater pumping and contamination as threats to the health of the state's water resources.

Finally, we regret that we have thus far not been able to evaluate your priority rankings for upland watersheds in any systemic way. The rankings of the top 20 or so look pretty good, but we have not had much of a response from our network. We count on local experts for confirmation of our impressions. I believe one problem is that your website, to which we referred people, is difficult to use. People can't easily see what's new and what's important.

For our own part, we have questions about the underlying data for, say, recreational uses, impervious surface, local watershed groups. Will it be possible to get more information on this data and how it was gathered as need arises? In this connection, the many thousands of pieces of information in the IWRM and the biannual reports raise the likelihood of inconsistencies, double counting, and so forth.

We foresee that, as the IWRM is used, numerous desirable data corrections and enhancements will emerge. It is our understanding that the document can be revised annually. We ask that you set up a simple, efficient way to make changes.

Thank you for this work.

Margaret Miner, Executive Director  
Tony Mitchell, Staff

*Lynne Bonnett, Concerned New Haven Citizen, 6-29-2016*

Mr. Christopher Sullivan  
Re: Integrated Water Resource Management project.

I support stronger goal setting with some enforcement power behind the goals. My experience as a citizen advocate working with community residents and agencies responsible for water quality improvements (Greater New Haven Water Pollution Control Authority) is that enforcement is key to driving change, otherwise people just continue to do what they have always done because it is easier. It takes people that care about the problem-we have that. We don't have effective public outreach to help educate the public about the issues from those that can really drive change, namely municipalities, state agencies and WPCAs..

The most direct way to make these changes occur is through enforcement actions such as consent orders. For example, GNHWPCA recently did a door hangar campaign to urge people to stop pouring grease down the drain -> blockages in the sewer pipes. They did this because they signed a consent order to that effect about a year ago. It is the first time in my experience that they have ever done a door hangar campaign; we have been asking them to do public outreach to encourage people to disconnect their downspouts from the combined sewer system-we are still waiting for that.

Change is hard, planning is part of it for sure but the "boots on the ground" need some urgency behind it to be a driver for change. The costs of failing to collectively address our water quality

problems allows communities to say, "why me? We're not the main problem. It's the guys over there."

Let's get on with it.

Sincerely,  
Lynne Bonnett

*Quentin Kessel, Concerned Citizen, Cons Comm Chairman, Mansfield, 6-29-2016*

And thank you for your prompt response to my call and email, Mr. Sullivan,

I have reviewed your methodology and the results in Appendix E and find it too complex to gain very much understanding on how you get from one to the other. I guess this is not surprising if it took professionals a year and a half to get this far and then rush to make some deadline, or other other requirement. Mostly what I have are questions, the answers to which I hope will be apparent in your final document:

1. The rivers contributing to the Willimantic reservoir include the Nautchaug, Mt. Hope, and Fenton Rivers. Of these, I believe the Fenton River is as impaired (due to University of Connecticut development and consequent water use) as the other two sub-watersheds. Why is only a portion of this watershed designated for protection? One goal of the Mansfield Plan of Conservation and Development is to lower the lengths of impaired waterways in the Town.
2. Do your assessments take into account the NextGen expansion of the University (and the corresponding increase of impervious surfaces)? The new sewer and water connections in the Town of Mansfield? The increased flow from the introduction of the new Connecticut Water Company line into the area and the University's sewage plant and from there to the Willimantic River?
3. Printed below are selections from the General Statutes that enable the State's Conservation Commissions (with my emphasis added). While we are responsible for advising Town officials, we also answer to the Commissioner of the DEEP, as you do. I trust that on future water issues, you will make an effort to contact the State's Conservation Commissions directly

These are only a few of the comments and questions that I am certain the Mansfield Conservation Commission would have, given the time to respond properly. Please enter these meager comments into your public record for consideration.

Sincerely yours, Quentin Kessel

(Although I chair the Mansfield Conservation Commission, these comments are from me, personally, and do not represent any official position of the Commission or the Town of Mansfield.)

*Ron (email comment with no last name), 6-29-2016*

Two lakes need help are Bantam Lake and lake Waramaug. I seen over the years that the water is getting greener and greener. There is way to many slimy weeds in Lake Waramaug and the bass fishing has been going downhill for years.

*Eric McPhee for Lori J. Mathieu, Public Health Section Chief CT DPH, 6-30-2016*

Dear Mr. Sullivan:

The Department of Public Health (DPH) Drinking Water Section (DWS) Source Assessment and Protection Unit has reviewed the Department of Energy and Environmental Protection's (DEEP) new focus to achieve water quality, Integrated Water Resource Management. As the agency with jurisdiction over all matters concerning the purity and adequacy of Connecticut's sources of public drinking water, the DWS views Integrated Water Resource Management as a valuable tool in maintaining the high quality of the public drinking water sources that serve the residents and businesses of this state.

The shift from the historic focus of restoring impaired waters to including preservation of healthy waters will provide a public health benefit to the customers of water companies statewide. The Recovery Potential Screening Tool provides a transparent and quantifiable approach to selecting watersheds for protection and restoration. It is noted that the Environmental Protection Agency indicates that association with public drinking water is one of the most powerful traits a watershed can have, concerning the need to demonstrate public support for restoration. The DWS believes that it is also a powerful trait to demonstrate public support for protection and should be included when ranking watersheds for protection as well. The DWS annually updates a list of the state's existing and future high quality public drinking water sources and posts this list on our website pursuant to Connecticut General Statutes (CGS) section 25-33(q). The High Quality Source List can be used as a basis to identify waterbodies that require protection, ensuring that the highest quality source waters are available for human consumption.

The state's sources of public drinking water enjoy protection from several progressive laws that are unique in this country. The prohibition of waste water discharges to tributaries of public drinking water sources serves to protect consumers from pathogens and emerging contaminants associated with waste water, however there are other water quality concerns named by the DEEP in the Integrated Water Resource Management report that are not addressed through specific regulation:

- Excessive nutrients can contribute to the appearance of algal blooms that create taste and odor issues for customers of public water systems or the type of harmful algal blooms (HABs) that can release cyanotoxins, similar to the HAB that occurred on Lake Erie, requiring the City of Toledo to issue a "do not use" notice for the customers of its public drinking water supply.
- Storm water discharges carry pathogens and chemicals that can tax the ability of water treatment systems to remove them.
- Storm water runoff also carries sediments that can settle in reservoirs, thus reducing storage capacity.

Because nutrients and storm water present the greatest challenges to the purity and adequacy of the state's drinking water supplies, it is recommended that the DEEP weight the social values

associated with public drinking water more heavily in the Recovery Potential Screening Tool for nutrients and storm water.

The Integrated Water Resource Management report notes that alternative approaches utilizing stakeholder involvement can be employed to achieve the protection and restoration goals set for the state. Where a selected watershed is also in a drinking water source water area, the DWS recommends that the DEEP consider contacting its fellow members of the Connecticut Source Water Collaborative and local health departments or districts with jurisdiction in those areas. The Public Water Systems that utilize these sources and the municipalities that encompass these sources or benefit from the protection of these sources can also be valuable partners to help achieve water quality goals.

Thank you for the opportunity to comment on Integrated Water Resource Management. The DWS is available to work together with the DEEP concerning this initiative. If you have any questions, please contact Pat Bisacky of my staff.

Sincerely,

Lori J. Mathieu  
Public Health Section Chief  
Drinking Water Section

*Linda Painter, Director of Planning and Development, Town of Mansfield, 6-30-2016*

Christopher-

Thank you for the opportunity to provide comment on CT DEEP's Integrated Water Resource Management initiative. In reviewing the materials presented on the CT DEEP website regarding this project, we noted that three of the proposed priority watersheds are located in Mansfield: the Mount Hope River, Natchaug River and Sawmill Brook Watersheds. We recognize the significance of the work put in by CT DEEP to develop this approach and similarly hope that you understand the need for communities to have sufficient time to fully understand what is proposed in order to provide informed, substantive comments with regard to the proposed priority listing of watersheds. As such, we respectfully request that DEEP extend the comment period for 30 days. An extension would allow Town staff and Commissions to better understand how watersheds are selected, the proposed planning process, and how the Department envisions implementation of resulting action plans (funding, technical assistance, regulations, etc.). Better understanding of these issues will help us to evaluate whether the water bodies mentioned above or others should be considered as part of the CT DEEP Integrated Water Resource Management Plan. If an extension is not possible, we offer the following official comments on the Integrated Water Resources Management planning initiative as it relates to the Town of Mansfield.

As part of the Mansfield Tomorrow Plan of Conservation and Development adopted in September 2015, Mansfield identified several goals related to protection and enhancement of our natural systems, including Goal 2.2: "Mansfield has healthy watersheds with high quality ground and surface water resources and aquatic habitat." The identified measure of how effective we are at achieving this goal is a reduction in the number of water bodies on the Connecticut Impaired Waters (303d) List. This Plan also continues the Town's long-standing approach to balancing

growth with protection of our natural resources and rural character through the establishment of Rural Character Conservation Areas and Smart Growth Development Areas. Using this approach, more intense development is directed to limited areas of town with infrastructure (water, sewer, transportation) to support that growth. These Smart Growth Development Areas comprise approximately 12.5% of total land area in the town.

While the POCD indicates that the Smart Growth Development areas are appropriate for more intense development, they are also home to sensitive natural systems. For example, portions of southern Mansfield within the Natchaug River and Sawmill Brook watersheds have been designated as Mixed Use Center and Compact Residential. The Plan includes several recommendations as to how the Town can improve protection of natural resources through the development review process; however, we are hopeful that the action plans developed through the Integrated Water Resource Management process will provide additional tools such as grant funding and technical assistance to help maintain the quality of these water resources as these areas develop.

It must also be noted that the northwestern (Storrs) portion of Mansfield is home to the main campus of the University of Connecticut and the new UConn Technology Park. Given the large concentration of population in this area and availability of public infrastructure, much of the area in the vicinity of campus has been designated for compact residential and mixed use development, including our new downtown (Storrs Center), the Mansfield Four Corners at the intersection of Routes 44 and 195, and the Hunting Lodge Road neighborhood. These areas are expected to be the focus of development pressure as UConn continues to grow and as water and sewer infrastructure is expanded to include the Four Corners area.

As with southern Mansfield, the area surrounding the UConn campus also has a number of watercourses that play a significant role in the health of the larger aquatic ecosystem, including tributaries to the Willimantic River such as Eagleville Brook, Cedar Swamp Brook, Nelson Brook, Weaver Brook and Dunham Pond Brook. Given the future land use designations and potential for future development in this area as UConn grows, these waterbodies and their associated watersheds should be considered for the priority listing in the Integrated Water Resource Management planning initiative so that the Town could have assistance of developing this area in a manner that maintains the quality of these water resources.

If you have any questions regarding these comments, please contact Jennifer Kaufman, Environmental Planner, at XXXXXXXXXXXX.

Thank you for your consideration.

*Scott Sharlow, VP Friends of Bennetts Pond, 6-30-2016*

Re: Statewide DEEP Integrated Water Management Plan

We wholeheartedly support the state's effort to address water quality issues as a means to foster and maintain a livable environment here in Connecticut. The list of priority areas in this plan are a great start, as it addresses both areas that the state must not allow to degrade as well as areas that need to be improved. Through partnerships with local municipalities, the state's goals can be reached. However, Connecticut must not rest its plan solely on the restriction of state funding (as it does with non-compliance with the State POCD), since this tool has no parallel on the local



level. A local zoning or wetland board is not able to prevent a polluting development based on its own POCD. Relying solely on the carrot will have no meaningful effect on restoring and protecting the state's waters.

With that in mind, and given that developers will almost always resort to the courts when their development plans are denied by local land use agencies, meeting those goals will take both the carrot and the stick. In order for the goals to be met, the state must find a way to provide enforceable regulations that will empower local communities to employ means to reduce TMDL's. We can't rely on pollutant travel time to fix our wetlands and watercourses and instead must work towards reducing the nutrient loads from the start. For that reason, we must look towards protecting the headwaters of the streams. Once the headwaters and their watersheds are impaired, that watercourse may never recover and will not be protected.

We should ensure that the State's other interests are also in line with protecting water quality and human health. One such goal in preserving open space should be to prioritize the interest in public health (clean water) by protecting and possibly purchasing lands that are within these protected and restoration areas. In addition, one can look at the most recent POCD and see areas shown as development areas that contradict this updated strategy of watershed protection. The state must provide a clear and consistent voice for its priorities.

Waterbodies that are already polluted by point and non-point sources, and are threatened by future high-density development, need to be restored and protected from further degradation for the health of the citizens of the State of Connecticut. The only way to ever meet the goal of restoring and protecting these waterbodies will be through meaningful state regulation. Identifying areas and implementing the 303d plan will have no effect if our local boards are not given the tools necessary to protect water quality. Since water does not respect political boundaries, the state must look for ways to ensure uniformity in the implementation of the rules and regulations. If within the same watershed, one town allows polluting development right next to another, it would appear to be a contradiction that could endanger the whole effort to implement an Integrative Water Resource Management plan.

Thank you for the opportunity to comment on this important initiative.

Sincerely,  
Scott Sharlow  
VP Friends of Bennetts Pond  
Ridgefield Open Space Association

*Shelley Green. The Nature Conservancy, Director of Conservation Programs 6-30-2016*

Dear Mr. Sullivan,

On behalf of The Nature Conservancy's Connecticut Chapter (TNC), we submit these comments on the draft Integrated Water Resource Management Report (the "Report") released by Connecticut Department of Energy and Environmental Protection (CTDEEP).

We strongly support how the Report incorporates and integrates water quality priorities from other CTDEEP programs and external partners and creates an opportunity for strategic approaches to accomplishing shared, measurable goals of restoration and protection of the

State's critical water resources. The Report identifies the need for new tools and approaches to water quality management beyond traditional TMDLs and the need to maintain high quality water quality through use of "Protection" action plans: a meaningful change to Connecticut's water resource policy that formalizes the importance of maintaining healthy watersheds for the benefit of people and ecological systems.

We are concerned about the Report's lengthy timeline -- plans developed by 2022 -- and urge CTDEEP to include a set of time-bound, interim objectives that would provide additional accountability and allow CTDEEP to assess progress and adjust approaches more effectively.

#### Introduction and Background

1. The Report effectively lays out the Integrated Water Resource Management approach, EPA's Vision, and the State's priority aquatic resources.
2. Additional background information on the Long Island Sound TMDL, EPA's expanded focus on nitrogen in coastal embayments, and its approach to targeting nitrogen reductions to achieve ecological health such as eelgrass recovery would provide helpful context for coastal embayment priorities.

#### Prioritization

3. We acknowledge and welcome the transparent priority setting method laid out in the Report.
4. The Report appropriately calls out the need for a proactive approach to plan development, evaluating ecological, social, and pollution data while considering opportunities for partnerships and achieving shared goals.
5. Although some complex water quality issues require longer time frames to gather sufficient information, we believe it is important to acknowledge that less complex issues present opportunities to quickly develop and implement restoration and protection plans (pg. 7).
6. The list of CTDEEP aquatic concerns and definitions is helpful. Although drinking water quality is not included in the list of concerns, it is referenced as a State water quality goal on page 10.
7. We recommend these additions:
  - "...nutrients from manmade sources - such as wastewater and fertilizers - can lead to excessive growth ..." (p. 8)
  - "...coastal embayments and our rivers and streams are affected by nutrients and can impair recreation and aquatic life and threaten human health" (p. 8)
  - "...healthy communities of fish that live in our rivers, streams and coastal embayments and the wildlife that use these resources." (p. 9)
  - "While much is being done to improve the health of Long Island Sound, more work is needed to restore and protect ecological conditions that support swimming, fishing and shellfishing both for the Sound..." (p. 9)

#### Assessment

8. The approach to using ongoing water quality assessments to evaluate healthy and impaired watersheds is well laid out, as is the need to identify data gaps and collect sufficient information for planning (p. 10).
9. The Report stresses ongoing monitoring to track actions. In addition to checking on success, consider incorporating objectives to regularly reassess and adapt management goals and actions based on new data and evidence (p. 10).

## Protection

10. This section spells out differences between restoration and protection and references the need for plan and actions (pg. 11). Consider adding examples of protection planning approaches to maintain high quality water resources, such as the Eightmile River Watershed Management Plan.

## Alternatives

11. Examples of alternative approaches to addressing water quality impairments are especially helpful and provide a good overview of potential water quality planning approaches and outcomes (pp. 11-13).

## Engagement

12. Approaches to engaging and communicating with stakeholders and partners are highlighted and are a critical component of successful watershed planning and action implementation. Including knowledgeable local land use decision makers in planning and providing options for implementation helps ensure successful outcomes (p. 15).

13. We see an opportunity to affirm the value of collaborating with NGO partners to fill data gaps, enhance monitoring efforts, expand research, and support information exchange.

## Integration

14. This Report reflects enhanced coordination between CTDEEP regulatory and environmental resource programs through watershed based planning, which is a beneficial, efficient, and often cost-effective approach to solving multiple water quality concerns. We applaud CTDEEP for incorporating priorities across internal programs. Every effort should be made to broaden integration with other Connecticut agencies priorities - in particular public health and safety concerns such as drinking water supply and flood risk - to streamline action and enhance public benefit (pg. 17).

## Preliminary Waters for Action Plan Development

15. The Report provides a good overview of selected preliminary watersheds for plan development and strong references to existing data and water quality reporting for selection criteria (p. 18).

16. Integration of coastal embayment and upstream watershed priorities sets the stage for effective planning and implementation of strategies.

17. It would be helpful to include deliverables, measurable short-term objectives, and timelines for plan development in this section. We recommend that the Report provide examples of watersheds that illustrate relatively simple planning needs versus significant data collection needs.

18. Adding a reference to EPA nitrogen strategy objectives for coastal embayments, particularly establishing ecological endpoints such as eelgrass recovery would improve clarity. CTDEEP timelines should be consistent with EPA Vision and LIS nitrogen strategy timeframes.

19. We find it is difficult to locate individual watersheds in tables, then trace their associated inclusion or exclusion on maps, and suggest that process be made user friendly over time.

## Technical Support Document

20. The Technical Support Document provides a helpful overview of CTDEEPs approach to setting priorities and use of EPA's Recovery Potential Tool.

21. We support the recommendation from Rivers Alliance of CT to use thermal metrics as indicators of aquatic health.

22. Incorporating ecological condition, stressors, and social indicators is helpful for assessing and ranking watersheds as well as useful for establishing measurable outcomes in plan development.
23. Does weighting partnership opportunities eliminate critical priority restoration or protection watersheds?

Sincerely,  
Holly Drinkuth, Director of Outreach and Watershed Programs  
Shelley Green, Director of Conservation Programs

*Larry Marsicano, Candlewood Lake Authority, Executive Director, 6-30-2016*

Dear Mr. Sullivan:

We appreciate the work you and the Department of Energy and Environmental Protection are doing in initiating the Integrated Water Resource Management strategy. We recognize the inherent difficulty in selecting appropriate watersheds for restoration efforts. However we would ask you to please consider adding Candlewood Lake to the Integrated Water Resource Management program based on the following as this process evolves and other watersheds are considered in the future.

#### **Socioeconomic, Recreational and Environmental Importance**

There are few inland water resources in the State of Connecticut that provide the level of outdoor recreational opportunity that Candlewood Lake does. There are numerous public boat launch sites including two State launches and five municipal launches. Each of the five municipalities surrounding Candlewood Lake maintains a public bathing beach facility as does the owner of the hydropower reservoir, FirstLight Power. The Lake is a destination boating location for all of Connecticut and the Tri-State area and hosts more organized fishing tournaments than any other lake in New England.

As a recreation destination, Candlewood Lake is an important economic driver, perhaps one of the most important economic drivers in the municipalities surrounding this, the largest lake in the State. In addition to recreation-based commerce, many other forms of commerce (e.g. food service, property management) greatly benefit from this inland water resource and property taxes on lakefront and lake community areas are critical to the wellbeing of our surrounding municipalities.

Much of the Candlewood Lake area is now in CT's Natural Diversity Database for providing habitat to a number of State-listed species, including Bald Eagles that have been successfully nesting here for at least five years. And as alluded to above, the fisheries in Candlewood Lake are nationally recognized with the Lake regularly ranked in the top 50 lakes in the nation based on Bassmaster rankings. In 2015 it was ranked 24th in the country.

#### **Environmental Stressors**

There has been much research on the water quality of Candlewood Lake which is due largely to its 30-year monitoring program and paleolimnological efforts that provided insights into the Lake's health prior to regular monitoring. There is also a comparable dataset on bacteria levels at shoreline beaches. Much is also known about the watershed as well. Water quality conditions and data collected from Candlewood Lake have most likely precluded it from being placed on the State's impaired waters list. However, conditions are changing.

In recent years Candlewood has started experiencing more frequent and intense blue-green algae blooms. Last year, town beaches were closed to bathing for the first time based on the State's guidance for beach closures and reopening due to cyanobacteria blooms. We have already experienced closure due to cyanobacteria in June of 2016. We would suggest that the occurrence of cyanobacteria blooms and beach closures due to blooms be given important consideration when looking for inland waters to restore.

### **Partnerships with Watershed Groups**

It is my understanding that a history of collaboration with local watershed groups was an important consideration in selecting watersheds for the Integrated Water Resource Management program. The municipalities surrounding Candlewood Lake in the form of the Candlewood Lake Authority have a long history of collaboration with the CT DEEP. An important example of our collaborative efforts was our Action Plan initiative supported through the 604B funds provided by the CT DEEP.<sup>2</sup> In that effort local land use regulations were examined in the five municipalities surrounding the Lake and recommendations made to town leaders on ways of improving those regulations in the interest of the Lake. A number of local regulatory changes were made in our towns and we continue to advocate implementation of our recommendations.

It is also my understanding that there is a concern with the potential "return on investment" of resources at Candlewood Lake. I would suggest that the return on investment variable should be weighted by the sum of values the resource provides that might be lost without restoration and the costs of restoration after a severe crash of the ecosystem. Based on current trends and with continued beach closures and cyanobacteria blooms I fear loss of value at Candlewood Lake would have cataclysmic impacts locally and statewide.

I wish you success in this initiative and trust you will consider these comments as you reassess your selections for planning or as you look to increase the number of watersheds you look to provide assistance in restoring.

Sincerely,

CANDLEWOOD LAKE AUTHORITY

Laurence J. Marsicano

Executive Director

*Eileen Fielding, Executive Director, Farmington River Watershed Association, 6-30-2016*

Mr. Sullivan,

Thank you for the opportunity to comment on the Integrated Water Resource Management plan for restoring water quality in Connecticut's rivers and streams. After attending DEEP's helpful information session on June 20th and reviewing the subwatersheds of the Farmington Basin that emerged (or did not) as priority areas, I have these comments and questions.

Overall, the approach makes practical sense and we agree with its intent. It addresses some weaknesses in the current approach, such as a possible over-emphasis by EPA on producing Total Maximum Daily Loads relative to other actions. It also seems to allow options for addressing pollution with alternatives to TMDLs that could be more efficient. We also salute the IWRM's stated intent to protect subwatersheds that are in good condition, as this is a cost-effective approach. The IWRM approach is also intended to focus less on the quick, easy fixes and focus more on solving complex and long-term problems. This too is a welcome change of emphasis. We also agree with the intent to re-assess the priority areas as new data become available or new conditions emerge. Updating the priority list every two years is an incentive to

stay engaged in providing information and building strong partnerships for active protection and restoration.

The IWRM approach does raise some questions when applied to cases our own watershed.

1. The Mill River/Farmington River area, identified as a priority for restoration, certainly could benefit from that status. Because of the IRWM listing, we anticipate more incentive and opportunity for FRWA to work with towns and other partners on restoration projects in this area. But we wonder about the consistency of priority status over time. Two years can be a short time to organize partners and funding for even a single project. It is certainly a short time for finalizing a 319 grant proposal and contract. Partners may mobilize for action on the basis of a priority listing for a subwatershed, only to have the area disappear off the priority map before funding or implementation. We hope there will be an understanding that an area that was recently on the map still merits consideration.

2. The West Branch of the Farmington River, identified as a priority for protection, is an area where existing social and environmental factors for protecting the watershed are strong. But we are quite aware of ongoing development pressures that put it at risk, so any additional incentive or resource for protection is welcome. Please note, a limitation for 319 funding in the West Branch is that the other main source of river protection funding comes from the Wild & Scenic River program of the National Park Service and cannot be used as match. Alternate funding sources would have to be sought.

3. Other parts of the Farmington River Watershed are potential priority areas and it would be helpful to know what specific changes could raise their ranking. We are currently involved in developing EPA-approved Watershed Based Plans for the Pequabuck River and the Still River. We expect that the completed plans, and any community action that they generate for reducing pollutant loads and gathering more data, could nudge these subwatersheds higher on the priority list. Likewise, the designation of the lower Farmington River as a Wild & Scenic River would include the Salmon Brook subwatershed, thus enhancing its protections and its community engagement in stewardship. But what, specifically can affect a subwatershed's rank? We understand the broad criteria, but seeing the data that are used to generate priority rankings would help us focus on the most relevant actions to take.

Finally and for the record, we deplore the lack of new resources for water resource management. Using existing resources more efficiently does have limits which may have been reached already. Also, when staff have to launch new procedures during start-up, immediate improvements in efficiency can be hard to realize. That said, we applaud this new direction and are committed to working with DEEP to make the IWRM approach work.

Sincerely,  
Eileen Fielding  
Executive Director

*Alicea Charamut, Lower River Steward, Connecticut River Watershed Council, 6-30-2016*

Dear Mr. Sullivan,

Thank you for the opportunity to comment on the potential areas for plan development identified through the DEEP's new approach to Integrated Water Resource Management in Connecticut. I can appreciate the need for a more systematic, data driven and objective approach to prioritizing basins for restoration and protection. The technical support document was helpful in

understanding how RPS Tool was used to achieve this goal. However, it is difficult for watershed managers to offer either agreement or further input on the rankings in Appendix D without seeing the data for the indicators which constitute the index numbers. For example, miles of free flowing streams is a heavily weighted indicator for several scenarios. If a watershed manager knows of one or several small dams that may not be in DEEP's inventory there is no way for that watershed manager to know if the input was accurate and to what extent it skewed the index scores and, therefore, the overall ranking.

Thank you for incorporating Wild Trout Management Areas (WTMAs) into the analysis beyond the RPS tool. Wild brook trout are an excellent indicator of cold, high quality water. However, Wild Trout Management Areas represent a fraction of the rivers and streams that support wild brook trout in Connecticut. I recommend that you incorporate additional data from Inland Fisheries on locations of wild brook trout populations into ARCGIS.

While every watershed manager would like to see all high quality or threatened sub-watersheds protected and every impaired sub-watershed restored, prioritization is necessary as resources are – sadly – always limited. I will be addressing only the waters identified within the Connecticut River Watershed.

#### **Lower Scantic River**

I am in full agreement with the prioritization of the Scantic River for restoration. Bacteria impairment is well documented in several sections and any action taken to reduce bacteria impairment will reduce other nutrient loads. The Connecticut River Watershed Council is willing to partner with local organizations in order to meet restoration goals on the lower Scantic River.

#### **Mill Brook-Farmington River**

I will defer to any comments made by the Farmington River Watershed Association about Mill Brook- Farmington River.

#### **Roaring Brook, Lower West Branch Farmington River and Eightmile River**

It would be silly to disagree with any watershed within the Connecticut River Watershed singled out as a priority protection for nutrients. In the case of all three of these watersheds, as is with nearly every watershed in a populated state, the primary cause of an increase in nutrient loads will be development. With the exception of the communities that surround Roaring Brook, many of the towns surrounding these protected watersheds are not subject to the MS4 Permit which is an important regulatory mechanism. I have concerns that the protections available through permitting may not be enough to protect these watersheds from the quality degrading effects of development.

It still remains to be determined if priority watersheds will also be a priority for state and federal grants. If this turns out to be the case, consideration should be given to how current funding is factored in to prioritization and how prioritization will impact future funding for watersheds that may never be considered a priority for restoration using the current analytical methods. The Lower West Branch of the Farmington River and Eightmile River are both designated Wild and Scenic which means they receive a fairly reliable stream of federal funding. While the very strong partners in both watersheds could certainly do a tremendous amount with more resources, would there be a greater benefit by spreading those resources out among watersheds that do not enjoy a steady stream of income? Will critically impaired watersheds like the Park Watershed which may never make the priority ranks be doomed to further degradation due to lack of resources and perhaps cancel out the improvements made in other parts of the Connecticut River Watershed?

Thank you again for the opportunity to provide comment. I look forward to meeting with you and your staff to determine how we can be of assistance in meeting water quality goals in the identified priority areas in the Connecticut River watershed.

Sincerely,  
Alicia Charamut  
River Steward

*Tim Visel, concerned citizen and educator, New Haven, 6-30-2016*

Hello Chris,

I see the water resource plan has a deadline of today and would like to make a couple of suggestions to the non-point source and watershed plan areas.

I see that storm water is mentioned but would urge DEEP to consider the amount of organic material (mostly leaves) as a significant source in nitrogen in estuaries and role in HABs -toxic blooms that require high levels of ammonia. Organic matter in shallow waters are subject to sulfate reducing bacteria- especially in very warm water. SRB bacteria generate ammonia in low oxygen conditions while utilizing sulfate as a oxygen source. They are also the source of sulfides and sulfuric acid washes. Further reduction can create a greasy sulfide rich sapropel which as it ages complexes heavy metals- complicating pollution indices. Methanogens in deep deposits concentrates wax esters and bitumens into a deposit that fuels the sulfur cycle. I feel these processes should be include and detailed.

The second suggestion is that bacterial monitoring from Escherichia coli be expanded to include Vibrios. Vibrios have impacted blue crabbers to our south and in the warm period 2012 the Connecticut shellfish industry. The Vibrio series are very serious pathogens, Vibrio Vul. and Vibrio Para., but the most infamous being Vibrio Cholerae there appears to be both a warm water and Sapropel link. I feel we should monitor these bacteria as well.

I can provide additional information- just wanted to get these suggestions in before the comment period closes-

Thanks  
Tim Visel

*Sandy Breslin, CO-Chair, LIS Citizens Advisory Committee, 6-30-2016*

Dear Mr. Sullivan,

The undersigned groups from Connecticut and New York are jointly committed to restoring Long Island Sound (“LIS”) and its tributaries. We write to provide collective comments on the Connecticut Department of Energy and Environmental Protection’s (“CT DEEP”) Integrated Water Resource Management Report (the “Integrated Report”) primarily as it pertains to Connecticut’s bays and harbors in the Sound and a Second Generation Nitrogen Strategy. We also urge the Department to promote ecological restoration and community resiliency strategies in the Integrated Report as critical tools for Connecticut’s communities, rivers and coast.

**Summary**



We commend the CT DEEP for its leadership and accomplishments in reducing nitrogen loading in the Sound. We are pleased that, through the Integrated Report and the development and implementation watershed action plans to achieve its Second Generation Nitrogen Strategy, the Department is joining the United States Environmental Protection Agency (“US EPA”) and the New York Department of Environmental Conservation (“NY DEC”) in collectively recognizing that it is time for a new chapter in nitrogen control in Long Island Sound—one that includes a focus on controlling local sub-watershed sources of nitrogen within specific bays and harbors in the Sound that are substantially impacted by excess nitrogen inputs. We applaud the philosophical approach expressed in the report and make the following recommendations:

1. **Include more specific objective “deliverables” and timelines** such as pollution source identification, load reduction modeling, and specific enforceable pollution reduction targets and actions to reduce sub-watershed loads in order to improve local water quality and restore and protect healthy ecological conditions. While we are aware of the limitations that current budget conditions place on the Department, we urge CT DEEP to take advantage of the opportunities and momentum offered by ongoing US EPA and NY DEC nitrogen reduction efforts. The Department can and should employ the more specific nitrogen reduction related objectives, actions and timelines to which other partners, in particular the EPA, have committed. These deliverables and timelines can also be informed by the more specific and timely outcomes envisioned within the Long Island Nitrogen Action Plan (LINAP) process. Partnering with EPA, sharing methods and lessons from the LINAP effort and harnessing an increasingly coordinated citizen-based science monitoring effort in our bays and harbors can provide CT DEEP with the resources it needs to move forward, building on its impressive record of nitrogen reduction accomplishments.
2. **Expand the list of priority waters proposed for action** to include five additional nitrogen heavy sub-watersheds based on the latest data regarding relative nitrogen loading to Connecticut harbors and embayments.
3. To achieve a truly integrated and cost-effective process, **promote a small set of green practices** that will provide a variety of clean water, resiliency, and ecological benefits along the streams, rivers and coastline of Connecticut.
4. Finally, please note that these recommendations are **consistent with the goals and objectives laid out in the recently updated Comprehensive Conservation and Management Plan (CCMP)** for Long Island Sound, which is endorsed by CT DEEP.

#### **Establish Timelines and Deliverables Parallel to EPA and DEC Nitrogen Action**

Steven Bellone, the Suffolk County Executive, has characterized nitrogen as “Public Enemy No. 1.” The Long Island Nitrogen Action Plan compiled by New York DEC and others calls for plans and TMDLs by 2017. Similarly, in its December 2015 Long Island Sound Nitrogen Reduction Strategy, EPA has set 2017 as the deadline for data collection, establishment of nitrogen thresholds for ecological endpoints (e.g. eelgrass) and watershed-based planning for nitrogen reductions, and 2018 as the deadline to implement new permitting and nonpoint source nitrogen reduction strategies to achieve healthy water quality conditions. In stark contrast, CT DEEP’s draft Integrated Plan only commits itself to completing plans for the protection of priority waters by 2022.

**We urge the Department to take advantage of the EPA and DEC momentum and timeframes, as well as EPA resources and work to achieve early targets. We ask that CT**

**DEEP commit to specific objectives and deliverables that are no later than the timeframes and deliverables identified by EPA.**

**Expand the List of Coastal Watersheds Selected as Priority Waters**

The Integrated Report identifies a series of watersheds as waters for priority protection or restoration. We commend DEEP for considering not only lower quality waters that must be restored under the Clean Water Act, but also higher quality waters that must be protected from becoming degraded. By way of example, while the Niantic River supports eel grass (as sign of health) the scallop population is now largely absent and there is a serious threat of continuing degradation.

While we support this concept, as well as the six clusters of coastal watersheds identified within Figure 6 of the Report as priority waters, we request that you consider additional coastal watersheds for inclusion. Our recommendation is based on reviewing the data on nitrogen loading to bays and harbors compiled by University of Connecticut Professor Jamie Vaudrey, in particular, a review of normalized loads. A normalized load is data referencing nitrogen loading normalized on a per hectare area of bay/harbor receiving area. We also considered the value of the embayment and how and to what extent it is used and enjoyed.

Based on a thorough review of Dr. Vaudrey's data, we urge the Department to consider adding the following nitrogen heavy coastal sub-watersheds as priority waters for action (units are kg N/ha-estuary/yr):

- Pequonnock River with the highest normalized load (5003)
- Byram River in both NY and CT (2953) (bi-state effort)
- Oyster River, Milford (2249)
- Mill River, Fairfield (1338)
- Stamford Harbor ( 1302)

For comparison, the embayments that DEEP selected (and whose continued inclusion we also support) are listed below, also including the total load of nitrogen to the embayment normalized to the area of the embayment. (kg N/ha-estuary/yr)

- Pawcatuck River in both RI and CT – (635) (bi-state effort)
- Stonington Harbor – (40)
- Mystic River – (252)
- Niantic River – (63)
- Farm River – (836)
- Sasco Brook- (2297)
- Saugatuck River – (113) (freshwater up north is 285)
- Norwalk Harbor – (270)

**Include Green to Blue Clean Water/Resiliency Strategies in your Planning**

CT DEEP has and continues to support a series of proven ecological and clean water strategies that create clean water, ecological and resiliency benefits. Most also restore or enhance critical habitat. We urge you to recognize these techniques within any Second Generation Nitrogen Reduction Strategy, the Integrated Report and/or any larger water-based strategic plan. These strategies include:

- **Opening up the hydrological blockages and pinch points that plague Connecticut's rivers and streams** with a particular emphasis on removing dams that (a) are blocking fish migration and lowering water quality and (b) are at a high risk for failure, and thus presenting a substantial flood risk to adjacent communities.

- **Designing LID practices into all new development as well as LID retrofits on a scale** to meet the impervious surface reduction targets now embedded in DEEP's recently released municipal stormwater permit (MS4) and consistent with analogous goals of the CCMP. These common targets call for a reduction of approximately 10% of effective impervious cover within communities over the next fifteen years. When achieved, this target will provide substantial clean water benefits as well as providing substantial community flood reduction benefits.
- **Protecting, restoring and enhancing our Long Island Sound tidal marsh system:** Tidal marshes are incredibly valuable clean water, ecological and flood protection assets. In the face of sea level rise and an increased probability of coastal storms, the well documented flood storage and retention capacity of tidal marshes will only become more valuable community resiliency assets.

We commend CT DEEP for its two-decade track record of regulatory protection and restoration practices that is largely responsible for a modest gain in tidal wetland resources across the Connecticut coast in recent years. Long Island Sound's marshes, however, are under increasing threat. Recently, U.S. Fish and Wildlife Service reported a significant "natural loss" of approximately 19% of Long Island's wetlands since the 1970's, in part due to nitrogen stresses and sea level rise.<sup>1</sup>

This same report documents that, on average, approximately half of the surface of the Sound's tidal marshes (46%) now have standing water at mean low tide, an indication of substantial stress.<sup>2</sup> Finally, this report notes that regional climate models predict a 20-45% loss in tidal wetland acreage by the end of this century, largely due to climate change and predicted sea level rise (Craft 2009).<sup>3</sup>

At 33%, the mid-range of the predicted tidal wetland losses is quite staggering.<sup>4</sup> It is higher than the 31% wetlands loss we have experienced largely due to development since 1880. Moreover, this loss is predicted to occur in the next 84 years as opposed to the longer 130 year loss period analyzed post 1880. The costs, economically and ecologically to our region, if we were to lose this resource are staggering. Based on the Report's per acre loss valuation<sup>5</sup>, if we were to lose another 33% of our tidal wetlands this century, a conservative mid-range economic loss estimate would be about \$250 million per year in today's values. Our coastal communities would also become significantly more flood prone.

As if this were not enough, we would experience an estimated reduction in nitrogen sequestration capacity of 13,500 tons per year due to this marsh loss. To put this in perspective, this is the approximate total nitrogen load that was discharged to the Sound from all sewage treatment plants in New York and Connecticut combined in 2015 (calculated at 13,900 tons for 2015).<sup>6</sup>

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Therefore, if we were to lose a predicted 33% of our tidal wetlands in the Sound this century, our loss of nitrogen absorbing capacity alone would result in the equivalent of doubling our current nitrogen pollution load from every sewage treatment plant discharging to the Sound from both Connecticut and New York.

In the face of this challenge, we must make every effort to protect, restore and enhance tidal marshes with the goal of not only protecting this resource, but also restoring it wherever possible to its historic conditions. To this end, we urge CT DEEP to consider piloting the beneficial re-use of clean dredge materials to both elevate sections of low marsh threatened with inundation, and restore marsh habitat in areas that have been lost in recent decades and have transitioned to open water/mud flat habitat. (A pilot could also be considered for certain areas on Long Island such as Northport where the transition from marsh to mud flats is striking.).

- **Encouraging Shoreline Softening Techniques.** As sea levels rise and flooding rates increase, property owners along the coast of our Connecticut estuary will install shoreline protection measures. We can enhance our net ecological balance and provide limited clean water benefits while protecting property by strongly encouraging shoreline softening techniques. By this term, we mean the use of a combination of engineered green living shoreline systems. At appropriate times, they can be combined with hybrid combinations of stone, timber or geogrid wave reduction barriers. These living systems can provide valuable fish habitat. When tidal marsh is included in the design, these systems can provide net clean water benefits.
- **Encouraging Sustainable Shellfish and Algae Culture.** Pilot projects supported by the LISS in the central and western basin of the Sound have demonstrated that raising “sea vegetables” and shellfish has measurable nitrogen reduction benefits. At least one grower has begun combining these techniques commercially, and other growers are being trained in these techniques. A study is underway to measure the nitrogen reduction benefits being derived from the town of Greenwich’s successful hard clam bed management and harvest techniques. Given that these projects, when sited properly have both ecological and economic benefits and provide private sector opportunities, we ask that the Department work collaboratively with the Department of Agriculture’s Division of Aquaculture to encourage wise siting and expansion of this practice.

All of the techniques listed above are encouraged by the recently revised Long Island Sound CCMP. We urge CT DEEP to reference the clean water advantages of these techniques and strategies within the Second Generation Nitrogen Plan, the Integrated Report and/or any broader strategic water planning process, highlighting their combined economic and community resiliency benefits.

To further promote these efforts, we strongly urge the Department to undertake an objective review of the permitting structures governing these activities, including input from practitioners in the field. In this new world, we must encourage adoption of innovative approaches to restore and protect clean water, protect fish and wildlife, and improve coastal and community resiliency and flood protection. Streamlining permitting practices for techniques proven to create net ecologic, clean water and resiliency benefits will help make that possible.

**Partnering and Next Steps – Strategies for a Changing World**

When the original nitrogen TMDL was created for Long Island Sound, CT DEEP had comparably more assets at its disposal and was able to lead its partners in a cutting edge point source reduction program.

Today, the Department has fewer human and planning resources than it did a quarter century ago and the near term budget climate is hardly encouraging. The good news is that the Department now has partners dedicating significant resources to the effort. The EPA will be undertaking much of the technical work needed to identify nitrogen reduction targets, load allocations and reduction strategies. We urge CT DEEP to take advantage of these assets and fold that work, its timeline and deliverables into your Report and planning process.

The NYS DEC is leading a parallel nitrogen reduction effort on Long Island with aggressive time lines and deliverables equal to EPA's. **To create a process that is integrated geographically, ecologically and administratively, we strongly urge CT DEEP to utilize similar timelines for establishing enforceable, measurable nitrogen reductions.**

To expand capacity and bridge data gaps caused by diminishing human and financial resources, we urge CT DEEP to expand its partnerships to include citizen based water quality monitoring groups. These groups are beginning to band together to develop a uniform protocol for identifying eutrophic conditions within bays and harbors around the Sound. By next summer, we anticipate that up to a dozen groups will be adopting portions of this protocol and producing eutrophic data that is comparable from bay to bay. Recognizing that CT DEEP is embarking on its own eutrophic sampling plot this summer, we urge the Department to work closely with the uniform citizen monitoring effort, make any final recommendations to improve it, and use the data generated to inform and adjust your local bay and harbor strategies.

Finally, we, the undersigned seek to become true partners with the DEEP in helping to shape and be a resource in the Integrated Water Resource Management Report and any associated planning processes. This effort is an extension of our shared mission of protecting and restoring our beloved Long Island Sound and reconnecting our rivers to that system. We welcome the opportunity to sit with you and your Commissioner to discuss your draft Report and our recommendations in more detail. To arrange a meeting or with questions, please contact Curt Johnson of Save the Sound, who serves as the Connecticut Co-Chair of the LISS CAC Policy and Legislative Committee at XXXXX

With thanks for your continued leadership and commitment to ensuring the health and safety of Connecticut's streams, rivers, lakes and Long Island Sound

*Mary Pelletier, Park Watershed, Founding Director, 6-30-2016*

Dear Mr. Sullivan,

Park Watershed is reviewing the proposed Integrated Water Resource Management (IWRM) Vision.

We understand the need for more effective implementation of the Clean Water Act (CWA) in Connecticut. In general, we appreciate the vision. However we are *very concerned* that the North Branch Park River watershed is not included on the DEEP *Preliminary Waters for Action Plan Development Map*, especially given that this could further reduce 319 funding available for the implementation of the 2010 North Branch Park River Watershed Management Plan.

Being included on the *Action Plan Development Map* will help transform the common misperception that the Park River watershed is a "throw-away" sacrifice zone. Earlier today while in the field for a brief stream survey with students from University of Saint Joseph's, and a concerned

homeowner whose property stretches to the middle of the North Branch, I debated differences between the North Branch and the Scantic River. I realize that for many deserving watersheds exclusion from the *Action Plan* appears to be a new layer of limbo. We suggest the state develop the following:

1. **A rotation timetable** to ensure all state watersheds will be included in the *Action Plan Development* process – and so anticipate when DEEP staff will focus expertise on local issues.

2. Recommended municipal land management practices and policies. This framework would give watersheds **not** included in the current *Waters for Action Plan Development Map*, actionable steps towards improving water quality, which could be rewarded – and so motivate local change.

3. **Add a designation of “Revitalization”** for watersheds such as the North Branch Park River that have been heavily modified. While numerous fragments of the North Branch can be restored, and there are ecosystems that deserve protection, there are also large areas damaged by past development projects. Damaged environments can be re-designed as 21st century green infrastructure to increase resiliency within high-density urban-suburban communities.

During the past decade Park Watershed has evolved into a 501c3 urban-suburban citizen stewardship organization with guidance from thoughtful CT DEEP staff and established non-profits such as Rivers Alliance of Ct, Farmington River Watershed Association, Ct River Watershed Council and North Central Conservation District. We have met numerous communities where the North Branch and its tributaries are valued as scenic landscapes that host a diversity of birds, wildlife and plants within a short walk of homes, schools, and offices. Here are few more reasons why the North Branch ought to be included on the *Action Plan Development Map* for four more years (through 2020):

- The State of Connecticut owns, manages and regulates considerable resources and projects throughout the North Branch Park River watershed. The MDC Long Term Control Project, numerous state office buildings *with parking lots*, UConn School of Law, Penwood State Park, and the North Branch flood control reservoir system are examples of diverse state resources and opportunities to leverage cost effective ecological improvements within this watershed.

- Numerous K-12 school communities as well as faculty at local institutions of higher learning, such as St. Joseph’s College, Univ. of Hartford, Trinity College and UConn are available to assist with improving nature within the environmental context of their respective campuses.

- North Branch has considerable cultural significance. Samuel Clemens gazed upon the North Branch Park River while writing great American river stories. Recovery of the river’s cultural heritage could benefit the Capitol City and the State.

After decades of neglect, interest in improving North Branch water quality is gaining momentum. In the coming year Park Watershed will be working with University of Hartford Art, Science and Policy programs to further refine our community outreach message and programming. Along with new leadership in various cultural institutions, City of Hartford staff have indicated positive interest in revitalization of the North Branch. However fragmented, these cultural landscapes are essential to the 21st century quality of life in high-density urban-suburban neighborhoods.

Patient support from Ct DEEP staff, especially Chris Malik, has helped Park Watershed understand and accurately relay complicated, often narrow, yet highly respectable state and EPA environmental goals, regulations and procedures to concerned citizens of the watershed. A wide range of CT DEEP staff have dedicated research and staff coordination efforts to review current conditions, and develop a TMDL, as described in the 2012 North Branch Park River Watershed Summary. Park Watershed hopes that CT DEEP and EPA R1 staff will not overlook the value of this recent research, which has sparked momentum for change. Removing staff and funding from our current project work would be premature. For this reason, please add the North Branch Park River to the DEEP *Preliminary Waters for Action Plan Development Map*, through 2020, so that we can successfully complete implementation of projects identified in the North Branch Park River Watershed Management Plan that we are now working on together. Once again, thanks for this opportunity to comment, plus a big thanks for the good work of state staff who care about the health of nature in Hartford.

Sincerely,  
Mary Rickel Pelletier  
Founding Director  
Park Watershed

*Martin Mador, president, and Mary Mushinsky, River Advocates of South Central Connecticut, 7-1-2016*

Comments from Rivers Advocates of South Central CT Regarding the Integrated Water Resource Management Project

We share the concerns of Rivers Alliance regarding the Integrated Water Resource Management (IWRM) Vision for effective implementation of the Clean Water Act (CWA) in Connecticut, and support the addition of the Mill River to the priority rivers of the South Central CT basin. We thank you for including the Quinnipiac and the West Rivers. Our staff attended the public hearing in East Hartford to inquire about the omission of the Mill River.

We support the emphasis on prioritization and the inclusion of protection with restoration as twin goals. Our group (recently incorporated) decided to focus on three rivers within the South Central CT Major Basin: the Quinnipiac, Mill and West Rivers. We chose these because of the dense urban population that benefits by restoration of these urban rivers, and because the stormwater management necessary to clean them up must be directed at municipalities and their land use practices. Why target Hamden, North Haven and New Haven for introducing best practices and leave out the Mill River? Marketing and public outreach campaigns will work best if the entire basin is educated together.

CT DEEP unfortunately omitted the Mill River from priority status. While we admit the Regional Water Authority is careful to protect water quality around their reservoirs and wells, their interest ends at Lake Whitney, and their wells certainly affect streamflow. The lower Mill River below RWA's Lake Whitney is an important urban recreation resource for New Haven residents, many of low income, and patrons of East Rock Park. We often take beginning paddlers to that section of the Mill River. Anglers frequent the river both upstream and in the park.

Because of the importance of urban rivers to urban populations, River Advocates of South Central CT asks that you add the Mill River of Greater New Haven to your priority list.

Along with Rivers Alliance, we understand that DEEP's resources are limited, but that is all the more reason to allocate them more evenly between planning and implementation. The public is getting mixed messages from CT DEEP. Under the 319 program we were told: "no more money for planning, only for implementation." Under the Vision, we are told: "keep planning."

Agreeing with Rivers Alliance, we recommend using thermal pollution as an indicator of impairment, and healthy thermal numbers as indicators of potential high quality. The data is inexpensive to gather and will help us identify key resources facing harm by climate change. An impairment associated with thermal pollution is low stream flow and aquifer depletion. Thank you for IWRM's attention to free-flowing streams and altered streamflow. We ask that you increase attention to groundwater pumping and contamination as threats to the health of the state's water resources. Wells and streamflow are certainly connected!

Finally, your priority rankings may be missing information. For example, the Mill River in Greater New Haven has at least three grassroots groups interested in its fate: River Advocates of South Central CT, Mill River Watershed Association, and the Mill River Trails group that recently received a major grant for a riverside trail system.

Thank you for your outreach to river stakeholders.  
Martin Mador, president

*Elizabeth Garra, Connecticut Water Works Association, Executive Director, 7-2-2016*

Dear Mr. Sullivan:

The Connecticut Water Works Association (CWWA), a trade association of municipal, regional and private water utilities, respectfully submits the following comments on the Connecticut Department of Energy & Environmental Protection's (DEEP) Integrated Water Resource Management plan to restore and protect water quality.

As stewards of the state's water resources, Connecticut's water utilities utilize a multi-barrier approach to protect the quality and safety of drinking water supplies. These efforts focus on source water protection programs, water treatment processes, asset management and infrastructure maintenance, and water quality monitoring practices.

In addition, water utilities have a strong record of compliance with state and federal laws designed to protect the quality of Connecticut's drinking water supplies. These laws should be acknowledged and incorporated in efforts to develop and implement an Integrated Water Resource Management plan, i.e. 1) the prohibition on the use of Class B waters for drinking water supplies; 2) the protection of a water utility's safe yield and Margin of Safety which ensures that there will be sufficient drinking water supplies to meet the public health and safety needs of Connecticut residents, now and in the future; and 3) the authorization of



interconnections to facilitate efforts to address the state's drinking water supply needs in a cost-effective manner.

CWWA also supports efforts, as outlined in the plan framework, which recognize the importance of building on successful local partnerships and efforts to address water quality issues. This will help ensure that the plan reflects the priorities of the state as well as our local communities, which is critical to developing a strong foundation for meeting the water quality goals identified in the plan.

Recognizing the importance of integrated water resource management to the protection of Connecticut's drinking water supplies, CWWA circulated DEEP's notice soliciting comments on the plan, including the preliminary waters that have been identified for action plan development. Although CWWA does not have specific comments relative to the waters identified for action plan development, we would like to be apprised of any changes to the Integrated Water Resource Management plan and any other issues affecting the implementation of the plan.

Thank you for the opportunity to comment.

Very truly yours,  
Elizabeth Gara  
Executive Director

*Michael Jastremski, Watershed Conservation Director, Housatonic Valley Association, 7-5-2016*

Dear Chris:

Thank you for the opportunity to comment on the Integrated Water Resource Management approach (IWRM) that the Connecticut Department of Energy and Environmental Protection (CT-DEEP) has developed for Connecticut. We appreciate CT-DEEP's commitment to restoring and protecting our waters, and recognize HVA's strong partnership with the Agency as essential to the success of our mission to protect the natural character and environmental health of the entire Housatonic River watershed, for this and future generations.

Our comments are summarized here:

- We are happy to see the emphasis on building and maintaining relationships with local partners to increase the impact of Action Plan development and implementation. We welcome any new opportunities for coordination and collaboration with CT-DEEP that arise from IWRM.
- CT-DEEP's strategic prioritization of sub-watersheds for Action Plan development under IWRM supports a key element of the 2015 update to HVA's Strategic Plan, which directs us to plan and implement our programs on a sub-watershed scale.
- Expanding the focus of water quality Action Planning in CT to include protection

of healthy waters is common sense, and we are thrilled with this element of IWRM. As watershed association that is also an accredited land trust, we are well positioned to further the watershed protection goals of IWRM in the Housatonic Valley.

- We are pleased to see the Carse Brook/Housatonic Mainstem sub-watershed as a Protection priority, but we ask that CT-DEEP also consider the Salmon Kill and sub- watersheds that drain to the Ten Mile River as 2016 Protection priorities.
- In anticipation of the next round of prioritization, we would like to discuss ways we can help make it more likely that the Shepaug watershed is selected.
- We are pleased to see the Still River on the 2016 list of sub-watersheds prioritized for restoration. We ask the CT-DEEP also consider including the Pootatuck River as a 2016 restoration priority.

**Building local partnerships:**

We welcome the IWRM focus on building local partnerships to accomplish water quality goals and make the most of limited resources. IWRM is a great opportunity to enhance the existing partnership between CT-DEEP and HVA and further our mutual goal of restoring and protecting water quality. We look forward to further discussions of how our work can support IWRM Action Planning and implementation in the Housatonic watershed.

**Sub-watershed prioritization**

We are pleased to hear that the IWRM approach will allow CT-DEEP to be more strategic when targeting sub-watersheds for Action Planning. CT-DEEP's roll-out of IWRM is timely as it comes just as HVA is beginning to build our own sub-watershed approach for planning and implementing our core programs (Land Protection, Watershed Conservation, and Public Education and Outreach). This sub-watershed program framework is a key element of the 2015 update to our Strategic Plan. Our directive is to identify impacted watersheds, which we would target for restoration efforts; healthy watersheds, which we would target for watershed protection; and transitional or tipping-point watersheds.

The results of CT-DEEP's prioritization process will be extremely useful to us as we work to set our own priorities at the scale of the entire Housatonic watershed. Ideally, our target sub- watersheds and corresponding management strategies for the CT portion of the watershed will align closely with those identified by CT-DEEP. The similarity in approach between the directive of our Strategic Plan and IWRM present opportunities for coordination and collaboration that we hope to capitalize on.

We would also like to explore the possibility of running a version of the Recovery Potential Tool to prioritize HUC-12 watersheds throughout the entire 3-state Housatonic watershed,

with the idea of replicating CT-DEEP's methods as closely as possible. We hope to discuss the feasibility of this analysis further with CT-DEEP staff.

Ideally, CT-DEEP and HVA will target their respective programs in a coordinated way in the Housatonic watershed. This will maximize the potential for collaboration and synergy between CT-DEEP's Action Planning and our work. We are glad to hear there will be regular opportunities for HVA and other stakeholders to participate in future rounds of sub-watershed prioritization for IWRM.

### **Protecting healthy watersheds**

We are very excited about CT-DEEP's new ability to work towards protection of healthy watersheds with water quality Action Planning under IWRM. This will help to address a critical need for proactive watershed protection in the Housatonic watershed. HVA is both an accredited land trust and a watershed association. We have the ability to deploy land protection, ecosystem management and community engagement strategies in concert to protect healthy watersheds. We are ready to bring these skills to bear to help implement Action Plans for healthy sub-watersheds of the Housatonic developed by CT-DEEP under IWRM. We recognize that watershed protection planning is relatively uncharted territory for CT, and we are eager to dive in and help develop a set of strategies that are appropriate for our region.

### **2016 healthy sub-watershed priorities:**

In addition to Carse Brook-Housatonic River, other healthy HUC-12 watersheds that CT-DEEP should consider prioritizing this round include Mudge Pond Brook and the CT portion of Outlet Webatuck Creek, which drain to the Ten Mile River; and the Salmon Kill, which is the focus of a significant amount work to restore cold-water habitat. We also would like to flag the Shepaug River drainage (including the HUC-12 watersheds Headwaters Shepaug, Bantam River, and Outlet Shepaug) as a potential candidate for the next round of priority watershed selection, and hopefully start a conversation about work we might do in the interim to make it a better candidate for Action Planning.

### ***Carse Brook-Housatonic River***

We see value in Action Planning for this watershed, particularly given the potential for upgrade of the Housatonic Railroad freight line that parallels the Housatonic along much of this stretch to passenger rail, and the proximity of CT Route 7 in some areas. The Housatonic mainstem through this area also just received designation as a Wild and Scenic River.

HVA and partners are working on several projects in the Carse Brook-Housatonic River HUC- 12. Trout Unlimited in cooperation with the Housatonic Fly Fishers Association is planning a project to enhance the summer thermal refuge that forms at the mouth of Mill Brook in West Cornwall. HVA has assessed nearly all of the road-stream crossings in the sub-watershed to identify barriers to fish and wildlife movement as part of an effort to develop Road-Stream Crossing Management Plans for the towns of Sharon, Salisbury, Cornwall and Canaan (see attached Fact Sheet). Results of these assessments are available at [www.streamcontinuity.org](http://www.streamcontinuity.org), or from HVA upon request. HVA is also building a car-top boat launch on the Housatonic just downstream of the covered bridge in West Cornwall. Finally, HVA through the Litchfield Hills Greenprint Collaborative is facilitating a land acquisition project in the Mill Brook watershed. More information about these projects is available upon request.

***Mudge Pond Brook/CT portion of Outlet Webatuck Creek***

Mudge Pond Brook and Webatuck Creek are headwater streams that flow from CT into NY and join the Ten Mile River. HVA has identified the Ten Mile River watershed as a priority for our watershed protection work based on its conservation value and relatively healthy condition, and threats to water quality from increasing development pressure associated primarily with the Harlem Valley line of the MetroNorth railroad (service from Wassaucott to Southeast). These issues are complicated by the fact that most of the watershed is in NY, but its immediate receiving waters are in CT. Consequently it is challenging to bring resources into the watershed for planning and management.

Over the past two years, we have steadily built support for collaborative watershed management among Ten Mile watershed municipalities, which is essential to overcoming the Ten Mile's jurisdictional challenges to securing resources for watershed planning and management. Last September, we convened the first meeting of the Ten Mile River Roundtable, which brought together municipal officials and other key stakeholders to discuss shared watershed management issues and strategies for working together to address them. We've met twice since then, and the Roundtable has agreed to pursue listing of the Ten Mile River and its tributaries as a NYS Designated Inland Waterway. Listing will make the watershed eligible for watershed planning and implementation grants administered by the NYS Department of State. We expect legislation adding the Ten Mile to the Designated Inland Waterways list to pass in early 2017, and a funding proposal to NYSDOS to develop a watershed-based management plan be submitted in June 2017.

While we will not be able to address Mudge Pond Brook and the CT portion of Webatuck Creek with NYSDOS funding, it is critical that we consider the entire watershed during the planning process. To this end, we have kept the CT towns of Sharon and Salisbury abreast

of our work across the border. Now that support for watershed management is solidified in NY towns, we are ready to bring Sharon and Salisbury on as members of Ten Mile River Roundtable. We expect them to be represented at the September meeting.

We are also actively seeking funds that aren't restricted to the NY portion of the watershed. In May 2016, we submitted a proposal to the NFWF Long Island Sound Futures Fund that will allow us to develop an inventory and synthesis of existing planning and research relevant to watershed management issues identified by the Roundtable (flooding, water quality, and river- oriented recreation), development of a website and social media accounts for the Ten Mile River, and an initial public outreach campaign to build support for watershed protection. Work in Mudge Pond Brook and the CT portion of Webatuck Creek would be eligible for this funding.

We anticipate continued work in these sub-watersheds over the next two to four years. In addition to the Ten Mile River watershed plan, this area is also covered by our road-stream crossing assessment and replacement planning project. Mill Brook (part of the Outlet Webatuck Creek HUC-12) is one of our target watersheds for this effort. Our partners at the UCONN Civil and Environmental Engineering Department are modelling hydraulic capacity at culverts in Mill Brook and other target watersheds, using peak flood flows determined with a hydrologic model they've developed in combination with our field data. We are also conducting in-stream temperature monitoring and collecting RBV samples near barrier culverts in our target watersheds, including Mill Brook, to help make the case for potential replacement projects.

### *Salmon Kill*

Trout Unlimited has been working for the past several years on a watershed-scale effort to restore cold-water habitat along the Salmon Kill and its tributaries. A significant amount of data on habitat and water quality was collected and used to identify and develop restoration projects. A variety of stream restoration practices have already been installed at project sites throughout the watershed, and implementation is ongoing. Please see attached fact sheet for more details.

The Salmon Kill is also one of the sub-watersheds HVA has targeted for the road-stream crossing assessment and planning project mentioned above. We have assessed all of the road- stream crossings in the watershed to identify barriers to fish and wildlife movement, and our partners at UCONN will be modelling hydraulic capacity at culverts in the watershed. As the Salmon Kill is the only target watershed within the partner town of Salisbury, we anticipate developing at least one conceptual design for a culvert replacement

project in the watershed.

Conceptual designs will be created using the Stream Simulation Design method developed by the US Forest Service.

The Litchfield Hills Greenprint Collaborative (a division of HVA) has identified a number of developable parcels in the Salmon Kill watershed that are good candidates for land protection. Given the level of investment in restoration along the stream corridor, the Salmon Kill is an excellent place to target land protection to ensure long-term watershed protection. A completed Action Plan that identifies land protection as a watershed management strategy would be very helpful as we pursue this goal.

### *Shepaug*

The Shepaug River drainage (including the HUC-12 watersheds Headwaters Shepaug, Bantam River, and Outlet Shepaug) contains many miles of high quality headwater stream, as well as areas that are impacted by development. The Shepaug mainstem is a popular fishing destination.

We anticipate moving some of our ongoing programs into the Shepaug within the next two years, including the road-stream crossing assessment and replacement planning work which we plan to complete for the Towns of Washington and Roxbury. There is also a fairly loose group of stakeholders from the watershed that occasionally come together as the Shepaug River Association. These folks could be encouraged to become more active.

HVA is interested in doing some advance work to increase the likelihood that the Shepaug makes the cut during the next round of sub-watershed selection. We would like to talk with CT- DEEP staff about how we might go about this.

### **2016 restoration sub-watershed priorities:**

#### *Still River*

We are pleased to see the Still River on the 2016 list of sub-watersheds targeted for restoration. As CT-DEEP knows, HVA is facilitating the development of a watershed-based management plan for the Still River aimed at addressing water quality impairments, improving river-oriented recreation opportunities, reducing flood risk, and restoring wildlife habitat. This work will be an excellent platform for additional water quality Action Planning. HVA is willing to support the Action Planning effort for the Still River in whatever capacity we are able to. Please see [www.stillriverwatershed.org](http://www.stillriverwatershed.org) for more information on the Still River watershed-based planning effort.

## *Pootatuck*

We suggest that CT-DEEP consider adding the Pootatuck River to the 2016 list of sub-watersheds targeted for restoration. The Pootatuck is a watershed that could be considered at a "tipping point" in terms of Impervious Cover, and it also has an enthusiastic local constituency to support Action Planning efforts.

In February 2016, HVA submitted a CWA Section 319 proposal to develop a watershed-based plan for the Pootatuck on behalf of a motivated group of local stakeholders, including Town of Newtown, Candlewood Valley Trout Unlimited, Newtown Forest Association and the Pootatuck Watershed Association. Deep Brook, a major tributary of the Pootatuck, is listed as impaired in the most recent (2014) State of Connecticut Integrated Water Quality Report to Congress. The entire main stem of Deep Brook, totaling 5.25 miles in length was listed as impaired for recreational use due to elevated levels of the bacteria *Escherichia coli* (*E. coli*).

The recently released Connecticut Watershed Response Plan for Impervious Cover (IC Plan) describes studies conducted by CTDEEP that observed a strong relationship between the percentage of a watershed under IC and the health of aquatic life in downstream waters. At 12% IC in a watershed these studies predict that there will be unacceptable impacts to aquatic life in downstream waters. The IC Plan goes on to say that, from a management perspective, it makes sense to consider 11% IC the threshold beyond which downstream aquatic life is likely impacted in order to add an appropriate margin of safety. By this measure, both Deep Brook and the Pootatuck are approaching a tipping point beyond which aquatic life impairments will be more likely. An analysis of IC by HVA found that about 9% of the land cover in the Deep Brook watershed and about 8% of the land cover in the Pootatuck watershed is impervious. The watershed-based planning process we outlined in our proposal will lead to projects that disconnect IC from storm sewers and surface waters, thus reducing the effective percentage of IC in the watershed. We have an opportunity to keep the Pootatuck below that 11% threshold with this project, and make it less likely that it will become impaired for aquatic life in the future.

In some areas of the Pootatuck watershed, notably Deep Brook, higher peak flows from IC and larger storms have increased erosion, disconnected stream channels from adjacent floodplains and caused some stream reaches to become unstable as the channel seeks a new equilibrium under altered hydrologic regimes. These reaches are a source of excess sediment and possibly nutrients, and could be contributing to downstream impairments. Local partners are interested in pursuing in-stream restoration work to enhance habitat in these areas, and have been successful at securing funds for these kinds of projects. We

believe stream corridor restoration projects that reduce instability and erosion and reconnect floodplains can have a significant and measurable water quality benefit in addition to restoring habitat. We are looking forward to working with our local partners to document the role these projects can play in addressing water quality impairments, and including this work as part of our NPS pollution reduction strategy for the Pootatuck.

Deep Brook and the Pootatuck Watershed are popular recreation destinations for anglers and hikers. Deep Brook and portions of the Pootatuck River are listed as a Class I Wild Trout Management Area (WTMA) by CT DEEP Inland Fisheries. Local partner Candlewood Valley Trout Unlimited has been very involved with monitoring and restoration work in the Deep Brook/Pootatuck WTMA. Local open space provides a number of opportunities for outdoor recreation along the Pootatuck and its tributaries, including Dickenson Memorial Park on Deep Brook, the Deep Brook Preserve between Wasserman Way and the Mouth of Deep Brook, Town of Newtown open space at the end of Commerce Road and at the mouth of the Pootatuck, and Newtown Forest Association's (NFA) Cullens Wildlife Preserve on the North Branch of the Pootatuck, and Rocky Glen State Park on the Pootatuck main stem.

Once again, we thank you for the opportunity to comment on this exciting new program, and look forward to new opportunities for collaboration with CT-DEEP.

**Sincerely**

Michael S. Jastremski  
Watershed Conservation Director

*Pat Young, Watershed Coordinator, Salmon River Watershed Partnership, 6-30-2016*

Dear Chris;

On behalf of the Salmon River Watershed Partnership we are submitting comments in response to DEEP's proposal for Integrated Water Resource Management. We appreciate all the effort that has gone into assessing all watersheds in the state.

While none of the five HUC12 watersheds in the Salmon River Watershed made either the first round of the top watersheds for Protection or Restoration, we would like to go on record with several requests and comments

1. It would be very helpful to have the raw scoring data for individual parameters. This will enable us to compare local watershed management activities with state data and determine where additional data or action might be beneficial.
2. The Blackledge River is labeled impaired with a TMDL for bacteria due to levels that exceed water quality standards at Gay City State Park. I don't believe this designation appears on the interactive map. If that means that it needs to be reviewed again to determine



whether it ranks higher for restoration, the Salmon River Watershed Partnership would appreciate an update as we are currently working with Gay City State Park, local Health District Officials and our DEEP Watershed Manager to gather more information on sources and possible remediation steps. Additional support from DEEP would be timely.

3. At the public information meeting June 20, 2016, I asked whether this process would impact potential 319 funding for impaired waters that are not on the current draft list for restoration. As you may be aware the Town of East Hampton and its Lake Watershed Committee are currently working on an EPA Model Watershed-Based Plan for Lake Pocotopaug due to issues with nutrient enrichment and subsequent algae blooms. The answer to my question was that it should not affect future implementation funding. If this proposal for watershed management will in any way favor projects on the Restoration Priority list, it should be made clear so that groups currently working on impaired water projects have an opportunity to comment.
4. The Salmon River Watershed Partnership is fortunate to have Eric Thomas, our DEEP Watershed Manager liaison attend our committee meetings to update us on current DEEP initiatives. He has been our primary information source for a variety of state proposals. Please continue to keep him up to date on any changes so that we are kept informed as well.

Thank you for the opportunity to comment, please feel free to contact me with any questions at XXXXXXXX.

Patricia Young  
Watershed Coordinator  
Salmon River Watershed Partnership

*Pat Young, Program Director, Eightmile River Watershed, 6-30-2016*

Dear Chris,

We are submitting comments on behalf of the Eightmile River Wild & Scenic Watershed Coordinating Committee. ERWSCC appreciates all the effort that has gone into review and ratings of the 184 watershed areas in Connecticut, especially in the light of dwindling state personnel and funding.

A bit of background on the Eightmile River Watershed. The Eightmile River was designated as a Wild & Scenic River by Congress in 2008. It was the twelfth river to receive designation under the National Wild & Scenic Rivers Partnership Program. Congress went one step further with the Eightmile and endorsed a watershed approach with the designation as it considered the individual tributaries to be integral to the health of whole watershed system.

The Eightmile River Watershed was designated as a Wild & Scenic River for not just one, but six, defined Outstanding Resource Values (ORVs), including watershed hydrology, water quality, unique species and natural communities and the watershed ecosystem. This required a rigorous collection of field data with numerous experts resulting in a Watershed Management Plan which is often cited as a model for other plans. A management plan however is just that, a plan, and only has value when it is acted upon. In the case of the Eightmile, the three core towns and local Land Trusts along with other organizations which include, the National Park Service, The Nature Conservancy, DEEP, Audubon and U.S. Fish

and Wildlife have committed significant resources to implement the plan, with a key focus on preservation and maintaining a healthy watershed system.

Watershed management is only truly effective when the system is considered as a whole. This is one of the reasons that ERWSCC sought and subsequently received approval by Congress for a watershed designation as part of Wild & Scenic process. As the HUC12 map (previous page) for the Eightmile River Watershed clearly shows, the East Branch of the Eightmile feeds what is designated on the map as the Main Stem at a point which greatly influences the part of the Main Stem below the confluence. So comprehensive protection planning should encompass the entire system.

ERWSCC would like to go on record recommending that both the HUC12 watershed sections for the Eightmile River Watershed be considered for Protection Prioritization. Since DEEP will be counting on partners to develop and implement further protection plans and since ERWSCC is a key partner representing the full watershed with the local knowledge and resources to contribute to effective management and would likely be taking the lead on some recommendations, it seems reasonable to proceed in a manner that ERWSCC already has in place; a full watershed approach.

We would also like to offer additional information on other initiatives that may not have been considered in the rating due to timing or activities that DEEP may not be aware of yet. They are as follows:

ERWSCC updates its Watershed Open Space Mapping at least *every* other year, and our mapping may be more detailed than what is available at the state level. Broken down by the HUC12, tallies of acres per HUC12 and amount of land preserved are indicated below. Land preserved is land that has some sort of legal permanent protection mechanism in place and we don't count land-use such as schools, cemeteries or other *active* recreation areas. The map on the previous page shows an *overview* of preserved lands and also miles of streams protected. We are happy to forward mapping layers if that is helpful.

Ed Bills Dam, a significant dam on the lower part of the East Branch of the Eightmile River, was *removed* last fall. Reestablishment of the river channel appears successful with fish passage restored. This opens up miles of tributaries for migratory fish.

ERWSCC has completed road culvert mapping for public ROWS (with the exception of Route 11 due to DOT restrictions) using the North Atlantic Aquatic Connectivity Collaborative protocol. With this data, ERWSCC and the towns are in a better position to consider options, including funding opportunities, for replacing culverts with more fish-friendly and climate resilient function.

ERWSCC has completed stormwater outlet mapping for the watershed towns, rating outlets for consideration for upgrading and/or replacement based on treatment levels, land use and vulnerability of receiving waters. The three core towns are not MS-4 towns, and the mapping and rating for retrofit exceeds state requirements.

ERWSCC, working with Three Rivers Community College, has expanded the number of

tributaries being sampled every fall for sensitive macroinvertebrates. We are currently sampling an average of 8 sites, up from 4 in previous years. Three are now in the East Branch of the Eightmile, compared to 1 site in previous years, with another site also planned in the East Branch for the fall of 2016.

ERWSCC has implemented a summer stream monitoring program that is currently monitoring 9 stations throughout the watershed. Measurements include temperature, pH, dissolved oxygen, conductivity, total dissolved solids and salinity. This was initiated as an effort to establish baseline data to determine trend changes in future years. Results are summarized at the end of the season.

Working with DEEP Inland Fisheries, ERWSCC has assisted with thermal mapping of the streams using HOBO loggers and is planning on working with USGS and DEEP Fisheries to conduct further geothermal cold water inputs at key tributaries.

CT Audubon is proposing that the Eightmile River Watershed and surrounding areas be designated as a landscape Important Bird Area (IBA-see map on the previous page) due to the presence of rare species, such as the cerulean warbler, which require large blocks of intact forest and well managed watersheds.

Finally as part of the Eightmile River Watershed Wild & Scenic designation process, the State of Connecticut Governor signed Public Act 05-18, *AN ACT CONCERNING DESIGNATION OF THE EIGHTMILE RIVER WATERSHED WITHIN THE NATIONAL WILD AND SCENIC RIVER SYSTEM* ( see Appendix I), which recognizes the watershed approach as part of the Wild & Scenic designation.

In summary, ERWSCC respectfully requests that the full watershed be considered as an integral system and be prioritized for protection accordingly. This approach embraces the strong management efforts that are currently in place and recognizes all the positive efforts that have occurred in both of the identified HUC12 watersheds.

ERWSCC would welcome the opportunity to discuss this further and be happy to provide any further information or answer any questions. Feel free to contact our office at XX

**Sincerely**

Patricia Young  
Program Director  
Eightmile River Watershed  
National Wild & Scenic Partnership Rivers

*Brian T Roach, Chairman, Source Water Protection Committee, CT AWWA, 6-27-2016*

The Source Water Protection Committee (SWPC) of the Connecticut Section American Water Works Association is comprised of source water protection specialists representing our state's public drinking water suppliers and is augmented by representatives of the

Connecticut Department of Public Health (DPH) and the Connecticut Department of Energy and Environmental Protection (DEEP). The SWPC mission is to support Connecticut's public drinking water suppliers in their day-to-day efforts to protect drinking water sources of supply and to help direct the future course of the protection of our state's public drinking water resources.

The SWPC believes that protecting and restoring the quality of Connecticut's waters by managing nutrient loading and stormwater runoff is essential and is especially important within public drinking water source water protection areas. Moreover, the SWPC supports water quality restoration and protection plans, such as the Integrated Water Resources Management Plan, provided they appropriately balance public water suppliers' ability to meet the state's current and future public health, safety, and economic development needs with other water resources needs. The SWPC, therefore, fully supports the DEEP's Integrated Water Resources Management Plan initiative and stands ready to assist with its development and implementation.

Sincerely,  
Brian T. Roach, Chairman  
Source Water Protection Committee - CT Section AWWA

*Tracy Brown, NE Restoration Coordinator, Trout Unlimited, 7-7-2016*

I received this information from HVA and was not able to comment during the public comment period. I would like to suggest looking closer at the Salmon Creek Watershed (Salisbury) in NW CT as a potential for Watershed Action Planning. Trout Unlimited has been working with the local community on habitat restoration since 2012 with NRD funds. As part of our work we have been working closely with eleven landowners, DEEP on fish monitoring and have also gathered water temperature data for the last several years documenting temperature impairments. The work is ongoing and the commitment from the local community is impressive in terms of support for our work and expansion of conservation easements in the watershed. All that said we have buy in from the local community already so the restoration potential is expansive.

If time allows I would like the opportunity to talk to you further about the potential for Salmon Creek to be considered.

Best,  
Tracy

*Cindy Ingersoll, Coordinator, Norwalk River Watershed Initiative 7-11-2016*

The Norwalk River Watershed Initiative wanted to share with you our thoughts regarding the selection of Comstock Brook (a tributary of the Norwalk River) as a site of high priority for bacteria impairment in this draft plan. We apologize for having missed the comment period as it took awhile for us, together with Harbor Watch, to uncover the attached study. However, we think it is important to share this before the final Water Resource Management Project is drafted.

We are questioning the selection of Comstock Brook as a priority segment for bacteria. While this segment has recorded elevated levels of indicator bacteria in the past, efforts to identify the source and resolve this issue were successful a few years back as the attached study shows.

This Comstock Brook study, reported in 2012-2013, was conducted by Harbor Watch with CTDEEP 604b funding and concluded that the bacteria issue had been resolved with the replacement of a failed septic in the area. The segment has not been sampled since by Harbor Watch. Unless another issue has caused new elevated levels of bacteria that Harbor Watch is not aware of, it doesn't appear that this water segment should be a priority for bacteria in this new Management Project.

The 2013 Comstock Brook report was part of the same funding that supported the Ridgefield Steep Brook trackdown study to identify the source of a longstanding issue with elevated levels of bacteria in the Norwalk River headwaters. This Ridgefield study had narrowed the likely source(s) but concluded that the additional steps needed to identify the source and resolve the impairment would require support from the Town. The bacteria impairment in the headwater segments of the Norwalk River continue today.

It would be logical to conclude that the Ridgefield headwaters be a priority segment rather than Comstock Brook. Or, perhaps, the lower Silvermine River, a major tributary of the Norwalk River in a densely populated area. Both of these segments have well documented and longstanding impairments due to bacteria. The Comstock Brook may have issues with flow, but to our knowledge and that of Harbor Watch, the bacteria issue had been resolved. If you have data more recent than 2013 that shows otherwise, please let us know.

Thank you for your time,  
Cindy Ingersoll