



April 4, 2019

To D.E.E.P. re: Comments on Water Quality Standards:

Save Our Water CT offers the following comments on sections of the Water Quality Standards which D.E.E.P. is evaluating for revision during its Triennial Review:

- **Define Highest Attainable Use:** We are concerned with how and when "Highest Attainable Use" will be determined for a waterbody and with the concept that environmental conditions may "permanently" preclude certain uses of that resource. All water bodies-even those currently deemed polluted-should retain the possibility of being improved. Permanently deeming them polluted is likely to result in the lack of any attempt to address the pollution.
- **Extended Disinfection Period:** We agree that the period of disinfection should be extended to April 1st-November 1st to better protect the health and safety of CT residents who contact water bodies during recreational activities.
- **Downstream Protection:** We agree that upstream pollution should not be allowed to degrade downstream water quality. It is also crucial that pollution in a downstream water body should not be used as a justification for allowing deteriorating water quality in upstream segments.
- **Updates to Numeric Water Quality Criteria:** CT waters should have the strictest possible water quality standards. If the new EPA recommendations allow for higher levels of toxics, bacteria, and ammonia than CT's current standards, the state standards should be kept.
- **Revise the Low Flow Statistic Applicable to Fresh Waters:** Using the Q99flow statistic appears to allow for streamflow monitoring via the USGS without the necessity of streamflow gauges and thus should be an asset. We hope the choice of the Q99 statistic (annual, monthly, seasonal) will be the one which best protects any given stream.
- **Water Quality Classification Maps:** While revising aquifer protection maps, it is important that the classification of river segments adjacent to or immediately upstream of public water supply wells be the highest possible.

Thank you for the opportunity to comment,

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