



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

Keith Ainsworth
Acting Chair

September 24, 2025

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Linda Bowers

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David Kalafa

Re: 2024 Draft Integrated Water Quality Report (IWQR)

Cinzia Lettieri

Dear Rebecca Jascot,

Aimee Petras

The Council on Environmental Quality (Council) provides the following comments regarding the Connecticut Department of Energy and Environmental Protection (DEEP)'s 2024 Draft Integrated Water Quality Report (IWQR).

Denise Rodosevich

Perfluorooctanesulfonic acids (PFOS) and Per- and polyfluoroalkyl substances (PFAS)

William Warzecha

Appendices B-1 and B-5 identify waterbodies that were listed for the Designated Use "Fish Consumption" due to detection of PFOS. The draft IWQR states that "fish consumption advisories are issued by the Connecticut Department of Public Health. The advisories are based on risk assessments conducted by CT DPH using fish tissue contaminant data", from statewide surveys of mercury contamination in fish from lakes and rivers that were updated in 2008. But it is unclear if the "listing" for PFOS is based on water sampling, fish tissue analysis, known releases of PFAS substances, or some other data source. The Council supports the sampling and analysis of media for the presence of PFAS substances, which is a persistent pollutant in the environment. The Council suggests that the IWQR include additional information regarding the data collection for PFAS substances and any future plans to assess PFAS contamination in rivers, lakes and estuaries in the state.

Paul Aresta
Executive Director

Recreation

The IWQR states that "lakes for which no bacteria data exist may be considered Fully Supporting of recreation if the lake is situated completely within an undeveloped area or if there have been no complaints of illness or excessive aquatic plant growth, or, as in the case of some urban ponds, swimming is not allowed but other recreation activities are supported." However, the "Criteria / Indicators for areas not designated as public bathing areas" identified in Table 1-9 indicates that "Fully Supporting" means that the "sanitary survey indicates no significant source of human fecal contamination, and There are a minimum of 8 samples for the assessment period, and no more than 10% of samples exceed the single sample criterion for Escherichia coli (410 CFU c/ 100 ml for non-designated swimming areas, 576 CFU/100 ml for all other areas) or there is no exceedance of the geometric mean criterion (126 CFU/100 ml)." The Council questions if "lakes for which no bacteria data exist" should be considered "Fully Supporting", based on the designation criteria in Table 1-9 or if such lakes should be designated as "Insufficient Information".

The Council also notes that the total length of river segments that are “Not Supporting” the Designated Use for recreation, identified in Table 2-1, increased from 844 to 947 miles, while the total length of river segments that are “Fully Supporting” the Designated Use for recreation decreased from 549 to 487 miles. The Council suggests that the draft IWQR provide more detail regarding the cause(s) for significant changes (i.e. greater than 10%) in miles and/or area for the Designated Uses from the previous report.

Thank you for your consideration of the Council’s comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive style with a long horizontal stroke at the end.

Paul Aresta
Executive Director