Integrated Water Planning Management 2

Summary of Public Comments and Responses to Comments

August 2025

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Date

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Background

Integrated Water Planning and Management is a process to identify water quality priorities for a 10-year period and fulfills requirements of the Federal Clean Water Act under Section 303(d). The Connecticut Department of Energy and Environmental Protection (CT DEEP) requested feedback on this Water Quality Planning topics in January of 2024 and accepted comments until February 16, 2024. Emails requesting comments were sent to interested parties including citizens; conservation organizations; universities; environmental consulting firms; water supply companies; tribal nations; and federal, state, and local officials. Informal, informational meetings for the general public were held via Zoom on January 16, 2024, during the morning and in the evening. The meetings were recorded and are posted on the IWPM2 website .

Comments received from the public are identified and discussed in the following document. Comments are paraphrased for brevity; however, every effort has been made to preserve the original intent of the comment. Responses may refer to other comments where similar issues were addressed; Original comments are provided in Appendix A. Direct reference to the oral public comments is not made since the comments provided orally during the public meeting were found to be adequately represented by the written comments referenced within this report. A copy of submitted public comments is provided in Appendix A to this document.

The comments have been grouped together based on common topics and a response provided. At the end of this report a summary of changes to be included in the updated Integrated Water Planning Management Plan is provided.

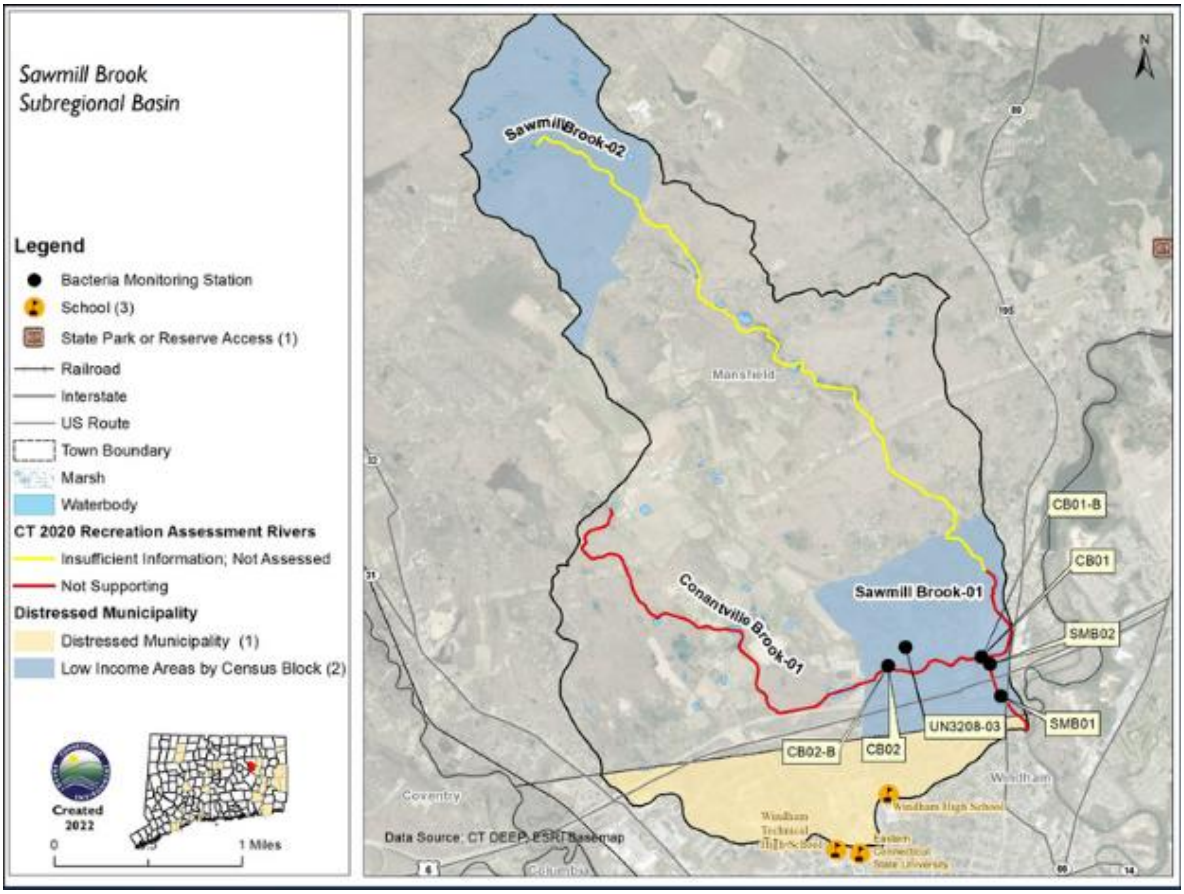
CT DEEP would like to thank all that participated in IWPM2 meetings and provided comments.

Comments and Responses Grouped by Topic

Environmental Health for All Communities

Comment #1:
The Council on Environmental Quality supports increased emphasis on water quality issues that could impact Environmental Justice communities; however, it is unclear how this would be done and what "robust emphasis" means. The Council suggests that DEEP coordinate with Connecticut Equity and Environmental Justice Advisory Council (CEEJAC) and especially the CEEJAC Water Subcommittee.

Response:
Thank you for your comment. "Robust emphasis" means that CT DEEP is placing additional focus on water quality planning for waters for all communities. For example, the Water Quality Program has added a section to Water Quality Action Plans (WQAP) to highlight areas of low-income census blocks (see map below). This section also suggests that those areas be prioritized for implementation efforts within the watershed to restore and protect water quality. We are also working with the CEEJAC Water Subcommittee to develop better education and outreach approaches in those communities. Integrated Water Planning Management was presented to the CEEJAC Water Subcommittee on January 10th to provide an opportunity for feedback on the IWPM program. Additionally, awards for grant programs under the Clean Water Act, such as grants provided under Section 319, consider whether a proposed project for funding will be conducted within these areas.



Waterbody: Batterson Park

Comment #1a:

The Council on Environmental Quality also supports increased focus on improving water quality to allow for swimming in publicly accessible water bodies within or near Environmental Justice communities, such as Batterson Park Pond that could, with improved water quality, serve as a public cooling space, given the projected increase in temperatures associated with climate change.

Response

Regarding Batterson Park Pond, pursuant to Section 143 of Public Act 23-204, DEEP was required to "study the feasibility of, and recommend options for the provision of, public recreational access to the Batterson Park Pond Park property located in the city of New Britain and the town of Farmington in consultation with the city of Hartford and other municipalities. DEEP held three public input sessions in Farmington, Hartford, and New Britain. For more information, please refer to the final study report final-batterson-park-study-for-cga-1-15-24.pdf (ct.gov).

The Report concludes the following, as excerpted from the Executive Summary:

Batterson Park has potential to be a recreational resource for the public located in a diverse, densely developed neighborhood setting, but it will require substantial investment of additional resources, and solutions to the following challenges:

- *Determine Safe and Sustainable Recreational Uses: Several potential recreational uses have been proposed for Batterson Park by various historic and potential future park users. A primary consideration for whomever is responsible for managing Batterson Park in the future will be to determine what activities are compatible with the impounded water quality of Batterson Park Pond and its elevated bacteria and nutrient levels. In addition, it is critical to match land-based recreational opportunities with the capacity, resources, and mission fit of the managing entity or partnership.*

- *Ensure Adequate Personnel and Financial Resources: In this Study, DEEP includes estimates of capital investments as well as the staff and funding that would likely be required to operate and maintain Batterson Park and provide public safety under various governance structures and recreational uses in the future.*

- *Establish Governance Structure for Park Maintenance and Operations: The City of Hartford owns Batterson Park. This Study examined four governance models and considered the likely associated infrastructure, recreational activities, public safety, and budget scenarios for each model.*

Waterbody: Tuttle Brook & New Haven Harbor

Comment #4:
I would like to request that Tuttle Brook and the area where it empties into Long Island Sound be added to your list of focus areas for your water quality program. The Environmental Assessment for the Tweed Airport expansion was recently accepted. There continue to be many concerns in the surrounding Environmental Justice communities about the expansion's effect on the water quality that were not thoroughly investigated. Lighthouse Point Park is an important recreation and fishing area and thriving oyster beds were recently discovered in that area. Cosey beach, Fort Hale Park, and other shoreline areas are sure to be affected. Runoff, flooding, deicing procedures, disturbance of the soil during construction are all non-point sources of pollution.

Response:
The Department appreciates the emphasis on Tuttle Brook and New Haven Harbor. The Department continues to focus efforts of several programs on the embayments of Long Island Sound, including the area of New Haven Harbor near Tuttle Brook. For example, there has been a recent effort to conduct water quality samples that included 17 monitoring locations in New Haven Harbor as well as many other Long Island Sound embayments. The results of this study and environmental modeling of pollutant loads to embayments will help prioritize future monitoring and actions to reduce pollution to all embayments in Long Island Sound.

These waters are prohibited for Shellfishing at this time which is determined by the Department of Agriculture's Bureau of Aquaculture.

A Water Quality Action Plan (TMDL) for Bacteria is planned for New Haven Harbor and Lighthouse

Point Beach in the future.

Monitoring is being conducted in New Haven Harbor as part of the Unified Water Study https://soundhealthexplorer.org/about/unified-water-study/ organized by Save the Sound https://www.savethesound.org/ (in consultation with CTDEEP). CT DEEP uses information from this study to evaluate water quality. More info here: https://www.savethesound.org/water-monitoring-ecological-health.

Extreme Weather Conditions

Comment #2:
The Council on Environmental Quality also strongly supports inclusion and consideration of potential impacts to water quality associated with climate change. As discussed in the Council's annual report, Environmental Quality in Connecticut, "it is predicted that as the climate warms, severe weather events, such as drought conditions and extreme rainfall will become more frequent".

Comment #31
Climate change is impacting water resources across our state both in terms of water quality and quantity, including our drinking water supplies. More than ever, Connecticut will be relying on our working and natural lands to provide nature-based solutions to address water resource concerns. Although the CWA does not address water quantity per se, the relationship between water quantity and water quality is important. This is critical as we address emerging issues such as harmful algal blooms. Additionally, with source water protection watersheds being a subset of watersheds draining to Long Island Sound, prioritizing them for action also directly protects the integrity of the Long Island Sound.

Comment #39b
Most importantly, FOTL (Friends of the Lake) believes that the formulation of modeling scenarios that reflect the impacts of climate change would help in the development of Action Plans that would be most beneficial.

Response:
CTDEEP strives to develop and support policies and legislation to promote resiliency, as well as participate in groundbreaking regional initiatives with regards to extreme weather conditions. Addressing extreme weather in a meaningful way presents residents, businesses, non-profits, and municipalities the opportunity to create, evolve, and maintain a sustainable environment, a robust economy, and a higher quality of life for current and future generations. As storms increase and rainfall totals climb, the impacts to surface water quality are increasing as well. There are multiple efforts in place to help address severe weather impacts, such as flood frequency, duration, turbidity, and soil erosion risks. To help address this issue, we have built extreme weather scenarios into our water quality models and added a section to our water quality plans.

In response to these impacts, a new resiliency office has been created within the Bureau of Water Protection and Land Reuse (WPLR) to directly address the urgent need to respond swiftly to the challenges posed by extreme weather. Considering the increased frequency and intensity of severe weather events, such as flooding impacts witnessed throughout 2023, it is crucial that we take proactive measures to enhance community resilience and mitigate the impacts of these environmental changes.

The resiliency office builds on WPLR's work in the areas of community resilience, especially in areas of flood protection, green infrastructure, water quality, and habitat restoration.

and manages a state resiliency grant program to implement green infrastructure and nature-based solutions.

For water quality modeling, where possible, the Department is including information on extreme weather conditions into model development. For example, a series of watershed models are currently in development for nutrients, stream flow and other related parameters. The models will cover the entire state of Connecticut and incorporate information on extreme weather conditions, allowing DEEP to consider this information when developing Water Quality Action Plans or other actions.

Public Water Supply – PFAS

Comment #17
Require water companies to remove PFAS from the water supply. Many water companies are aware of the presence of PFAS chemicals in the water they supply, as well as the dangers posed by these chemicals, but they are currently not required to do anything about it.

Comment #32a
I urge that towns be mandated to clear our water supply of PFAS.

Comment #44
The public has limited knowledge of the status of our water quality and water supply. The regulation of water in Connecticut is behind that of many states in New England, as PFAS shows. The soil surrounding Westport's water storage tanks was highly contaminated. Its two large wellfields are above the PFAS limit (4ppt). Westport remains non-compliant with all water-related fire protection standards.

Response:
CT Department of Public Health is actively working to address any potential for PFAS to impact drinking water resources in Connecticut. Please visit their Per- and Polyfluorooalkyl Substances (PFAS) Information for Public Water Systems website for additional information.

Public Water Supply – Protection

Comment #3:

Lastly, the Council on Environmental Quality notes that over two-thirds of the population served by community public water systems (PWS), which is estimated to be approximately 2.5 million residents, are supplied by surface water sources with groundwater sources supplying the remaining community PWS population and most private wells. Although DEEP is recommending refining the topics that were previously outlined in IWPM phase 1 and not introducing any new topics, the Council recommends that DEEP include 1) enhanced focus on the protection and improvement of water sources that provide for safe drinking water, and 2) more emphasis on land use controls (i.e. zoning, setbacks, low impact development) to help protect water supply watershed lands.

Comment #30

Source water protection is focused on addressing nonpoint source pollution through watershed management measures, and this is where DEEP needs to play a critical role supporting the work of DPH and the Water Planning Council in protecting our state's drinking water supplies. DEEP does have authority over the drinking water supplied by aquifers and prioritizes Aquifer Protection Act areas in many of its documents. It needs to do the same for surface water supplies by including drinking water supply and source water protection as a priority in the IWPM.

Comment #45

Aquarian Water Company stated that the water crises in Flint, Michigan, and Jackson, Mississippi, are closer than we think in Connecticut. Is the company's statement true or not? It is unclear what state agency can answer that question. Our state's level of system knowledge remains poor.

Response:

The Department agrees that both source water and surface waters are critical resources to protect drinking water supply areas. The CT DEEP Aquifer Protection Area Program and the Department of Public Health (DPH)'s Drinking Water Section have had a long-standing mission to protect source water and CT drinking water resources, and the Departments will continue to do so.

CT DEEP also has other tools and approaches that can protect drinking water resources. Under the CT Water Quality Standards, a surface water classification of AA is established to identify and protect waters that are existing or proposed for use as a source of drinking waters. Another classification of A is established for waters that may be a potential drinking water supply. The Water Quality Standards prohibit discharges from industrial and municipal wastewater treatment systems to both Class AA and A waters. This regulation provides additional protection to drinking water resources. (Section 22a-426-4 of the Water Quality Standards)

Additionally, Section 22a-417 of the Connecticut General Statutes imposes an absolute restriction on the discharge of sewage to Class AA reservoirs and their tributaries. The existence of a discharge to surface water which occurs outside the state that then flows into the state shall not be considered a valid reason for either relaxing the restriction in Connecticut or changing the Class AA designation. It is a policy of the state to pursue the adoption of compatible Water Quality Standards in neighboring states to assure the protection of Connecticut drinking water

supplies."

In addition to the CT WQS at the state level, there are many land use controls in place at the local level to protect ground water in CT. Tools for local groundwater management include regulatory measures within Planning and Zoning Commissions including rezoning, design and performance standards, sub-division regulations and permitting procedures. Municipal ordinances for hazardous materials and underground storage tanks can be issued to protect private wells. Non-regulatory programs can be established to inform others of the importance of groundwater protection and public water supply sources through public outreach and education. Please refer to CT DEEP's Protecting Connecticut's Groundwater, A Guide for Local Officials to learn more about how groundwater protection efforts can be implemented at the local level.

For the next round of water quality planning priorities, CT DEEP will partner with DPH to enhance the focus on the protection and improvement of water sources that provide safe drinking water supplies for water quality planning projects that include drinking water sources in the project area.

Pesticides

Comment #5:
Ban pesticides except for extreme circumstances when no alternative exists.

Comment #18
Tighten the Rules on the Use of Pesticides & Herbicides. Regulations governing the use of pesticides and herbicides in Connecticut must be tightened, especially for properties that are above aquifers and those that abut or are near rivers, streams, or other bodies of water (e.g. Longshore Park in Westport, as well as other golf courses and properties with large lawns).

Comment #33
I am additionally concerned about the levels of toxic pesticides and herbicides in use in large swaths of land such as golf courses, athletic fields, and the like. I would like municipalities to be banned from using such substances on public lands. I know there are restrictions in place for individual consumers, who can no longer purchase many substances, yet these are used in large quantities by licensed applicators to public lands where we gather.

Comment #36
Pesticides & Herbicides: Regulations governing the use of pesticides and herbicides must be strengthened, especially for properties that are above aquifers, and those that abut or are near rivers, streams, or other bodies of water (e.g. Longshore Park in Westport, as well as other golf courses and properties with large lawns). Chemical pollution from runoff infiltrates our water sources and waterways and must be mitigated.

Response:

Pesticides must first obtain federal and state registration before they can be sold or used in the state. EPA bases their decision to federally register a pesticide on many factors which include, but are not limited to, ecological/environmental and human health risk assessments. The conclusions of the risk assessments allow EPA to make informed decisions regarding whether to approve registration of a pesticide as proposed, or whether additional protective measures are necessary to minimize the potential for harm, such as requiring buffer zones to protect water bodies and other sensitive areas. The most current scientific methods are utilized in conducting the ecological risk assessments to determine toxicity to wildlife and plants and environmental fate to assure that they will not pose unreasonable risk of harm to the environment. Additionally, EPA periodically re-reviews pesticides to determine whether a change in the registration status is warranted.

Further review during the state registration process can result in additional restrictions being placed on the distribution and use of a pesticide or denial of the application.

Commercial pesticide applicators must have certification (Commercial supervisor or commercial junior operator) to apply pesticides to property that they do not own. Commercial pesticide supervisors are required to acquire continuing education on topics including integrated pest management (IPM), pesticide safety, review of pertinent statutes and regulations, etc. to renew their certification. They will soon also be required to provide specific annual training to employees with junior operator certification who work under their supervision in accordance with recent revisions to federal pesticide laws.

It is important to note that municipal employees who maintain school grounds are required to hold pesticide certification for which the same training is required. And, while there are significant restrictions in place regarding pesticide use on school grounds, a municipality can choose to use no pesticides, implement integrated pest management (IPM) programs, or opt to use organic and/or minimum risk pesticides for other municipal properties without additional state mandates.

By design, pesticides are intended to kill a pest and must be used in accordance with the requirements on the pesticide label to minimize the risk of environmental harm. The label is the law. Failure of any applicator, certified or not, would be in violation of federal and state law for which civil penalties can be imposed.

Artificial Turf

Comment #6:
Ban artificial turf, multi-layer plastic surfaces that leach water- containing PFAS and other toxic chemicals.

Comment #14
Artificial turf leaches toxic PFAS (or “forever”) chemicals into the water supply. In fact, PFAS compounds are also found in other types of infill, as well as in the blades and backing of the turf. And these compounds accumulate in the human body and are toxic especially for

children and pregnant women.

Comment #15
Artificial turf is a huge source of microplastics, both from the degradation of the infill and backing, as well as the breakdown of the blades. And this plastic, which is also a health hazard, is also winding up in our waterways, in our water supply, and in our bodies.

Comment #16
Artificial turf also contributes to climate change. Unlike natural grass, which absorbs carbon dioxide (CO2), artificial turf does the opposite: it releases CO2, as well as methane and other chemicals. Indeed, it is now estimated that a 2-acre artificial turf field generates55.6 metric tons of CO2 over its useful life (i.e., 10 years).

Comment #32b
I further advocate for a ban on substances such as artificial turf in Connecticut.

Comment #34
I am writing with an urgent request. I have seen the data on the issues around PFAS and Astroturf and how harmful it is. I also know that many municipalities are considering using it for playing fields for our most vulnerable residents – our children!

Comment #35
Artificial Turf: It is a public health imperative that we halt the installation of artificial turf to prevent: (i) the leaching of PFAS ("forever") chemicals into our water supplies; and (ii) the leaching of micro-plastics into our water and the environment.

Response:
The Department is aware that there is significant public interest regarding the environmental impact of artificial or synthetic turf fields, most recently in relation to PFAS. DEEP is actively reviewing peer-reviewed scientific research results available to determine what, if any, PFAS-specific environmental impacts are associated with artificial turf. Given that this is an emerging area of research there is a very limited number of studies available to consider.

It is unclear whether installed artificial turf is a source of PFAS contamination to soil, surface water, and/or ground water. Interpretation of monitoring results is complicated by the presence of PFAS in air and rainwater. Studies that do not account for this are of limited utility for determining the environmental impact of synthetic turf, because it is unclear whether PFAS present in samples originated from the turf material, rainwater, or air deposition. Similarly, studies that measure PFAS in surface water and groundwater without collecting flow data have limitations. For example, PFAS concentrations in a stream may become diluted (decrease) during periods of significant rainfall and 'high flow.' Such concentrations can also become concentrated and appear to increase during periods of limited precipitation and lower stream flows. Comparing high flow data to low flow data can provide misleading results. To-date, DEEP is aware of only one peer-reviewed published field study (Lauria et al. 2022); although PFAS can be present in the turf material, the results of this study indicated

that fluorinated substances remain bound to the turf material and are not released to the environment.

DEEP will continue to review new research as it is published and will utilize the best available science to inform any PFAS-related artificial turf actions or decisions.

Please refer to the following webpages for more information: https://portal.ct.gov/deep/remediation--site-clean-up/contaminants-of-emerging-concern/pfas-minimizing-environmental-exposure#artificialturf and CT DPH Artificial Turf Fields https://portal.ct.gov/dph/environmental-health/environmental-and-occupational-health-assessment/artificial-turf-fields.

For information on microplastics, please see the CT DEEP Microbeads https://portal.ct.gov/deep/municipal-wastewater/microbeads and Microfiber Pollution https://portal.ct.gov/deep/p2/microfiber-pollutionwebpages.

Irrigation

Comment #7
Limit irrigation of lawns and gardens to conserve as much water as possible.

Comment #19
Mandate the Adoption of Gray Water & Sustainable Initiatives. With our supply of potable water dwindling due to periodic droughts and high demand, we cannot afford to squander it on golf courses and the like. We need to require the installation of Gray Water recovery systems which will allow us to irrigate outdoor spaces without depleting a scarce and valuable resource.

Comment #37
Gray Water & "Sustainable" Alternatives: With the supply of potable water being limited due to drought and high demand, when possible, not a drop can our should be used for the irrigation of golf courses and other, similar, sites. Gray Water provides an appropriate opportunity to irrigate without depleting a scarce and valuable resource and minimizes the externalization of environmental and health costs borne by an unsuspecting public. Additionally, reducing, and/or eliminating lawns where possible, and replacing them with other plantings can further reduce the demand for water.

Comment #49
For instance, irrigation restrictions have accomplished a 20% water usage reduction in the critical summer months - almost immediately when put into place in Southwest Connecticut. So much more is needed and possible (e.g., smart metering, weather-based irrigation control, natural lawns, cisterns, greywater)

Response:
The Department of Energy and Environmental Protection (DEEP) regulates activities under the

Water Diversion Policy Act (WDPA) that cause, allow, or result in the withdrawal from, or the alteration, modification, or diminution of the instantaneous flow of the waters of the state. Section 22a-377(c)-1 (a)(1) of the Regulations of Connecticut State Agencies defines one of the regulated activities as any withdrawal of groundwater from one or more wells joined in one system whose combined maximum withdrawal exceeds 50,000 gallons of water in a 24-hour period, as well as withdrawal of surface water in excess of 50,000 gallons of water in a 24-hour period. This regulated activity applies to most large-scale irrigation operations and would require a diversion registration or permit from the DEEP.

Residential irrigation is not typically under DEEP's jurisdiction, as it would not meet the regulatory thresholds under the state regulations. Therefore, DEEP cannot limit irrigation of lawns and gardens to conserve as much water as possible. DEEP's Water Quantity Program promotes water conservation to ensure plentiful water for all users. Water conservation tips and resources are available on the website at https://portal.ct.gov/DEEP/Water/Water-Quantity/Water-Conservation.

DEEP acknowledges that irrigation restrictions accomplish water use reduction in the critical summer months. As such, when DEEP issues a diversion permit for irrigation of turf (such as a golf course), a long-range water conservation plan is required as part of their permit application. DEEP may include conditions in the permits as part of the approval whereby the permittee is required to install a meter, abide by drought restrictions, and submit an annual summary of steps taken to conserve water throughout the year.

Public water supply utilities come under the jurisdiction of the WDPA and may choose to adopt their own irrigation restrictions for customers in their service areas. These restrictions are included in their long-range water conservation plan. If a water utility is required to submit a water supply plan to the Department of Public Health, their plan is required to identify priority users for times of water supply emergencies (such as drought). Priority users are based on the potential risk to health, safety, and welfare. Also, a water supply plan must include a list of actions taken by water utilities during different drought stages. When DEEP reviews a water supply plan, we recommend to the utility to utilize 100% metering across their service area. Typically, residential private well owners would not be under a water utility's jurisdiction to be restricted on water use or be required to install a meter.

DEEP supports the use of gray water for non-potable purposes. A gray water system should be consistent with requirements of both the Public Health Code of the State of Connecticut and the local health district. DEEP is currently identifying irrigators with on-site water treatment that may be eligible for repurposing treated effluent for irrigation. Before effluent can be used for irrigation, it must be treated to certain water quality standards.

DEEP recommends utilizing xeriscaping to reduce the need for irrigation and emphasizes the use of native plants. The Appendix A of Connecticut Stormwater Quality Manual https://ctstormwatermanual.nemo.uconn.edu/a-plant-list/ includes a list of native plants to be used for xeriscaping.

Single Use Containers

Comment #8
Ban nips (mini one-serving plastic and glass liquor bottles) so people cannot throw the empty containers into water bodies and storm drains.

Response:
Thank you for your comment. The management of nips and their impact on communities in Connecticut is an issue that has been raised to the Connecticut State Legislature. House bill 5215 was raised during the 2025 legislative session, including a public hearing in February. You can find information on this bill here. We recommend that you contact your legislator to share your opinions regarding these efforts.

Lawn Equipment

Comment #9
Ban leaf blowers. They spread pesticides, heavy metals, oil, gas, and other toxins that pollute our water.

Comment #20
Phase Out the Use of Gas-Powered Lawn and Garden Equipment. A number of towns in the state is already regulating the use of gas-powered leaf blowers, which are probably the most egregious tool in the landscapers' arsenal, at least when it comes to pollution.

Response:
The Department thanks you for your comments. This topic is outside of the scope of this project. It is a topic that is periodically discussed at the State Legislature. Any such bans would have to be authorized through new legislation.

Wetland Preservation

Comment #10
Limit construction on and paving over wetlands to preserve as much of our pristine, toxin-filtering eco-system as possible.

Response:
In Connecticut, the tidal wetlands law and coastal management law do have a preservation policy in place, stated explicitly. The language and statute are cited below, from the Tidal Wetlands Act. The CT Coastal Management Act also refers to this preservation policy for coastal resources.

CGS Ch.440 Sec_22a-28
Sec. 22a-28. (Formerly Sec. 22-7h). Preservation of tidal wetlands. Declaration of policy. It is declared that much of the wetlands of this state has been lost or despoiled by unregulated dredging, dumping, filling and like activities and that the remaining wetlands of this state are

all in jeopardy of being lost or despoiled by these and other activities, that such loss or despoliation will adversely affect, if not entirely eliminate, the value of such wetlands as sources of nutrients to finfish, crustacea and shellfish of significant economic value; that such loss or despoliation will destroy such wetlands as habitats for plants and animals of significant economic value and will eliminate or substantially reduce marine commerce, recreation and aesthetic enjoyment; and that such loss or despoliation will, in most cases, disturb the natural ability of tidal wetlands to reduce flood damage and adversely affect the public health and welfare; that such loss or despoliation will substantially reduce the capacity of such wetlands to absorb silt and will thus result in the increased silting of channels and harbor areas to the detriment of free navigation. Therefore, it is declared to be the public policy of this state to preserve the wetlands and to prevent the despoliation and destruction thereof.

DEEP regulates all areas for tidal and coastal resources and because the policy is preservation, any impacts to tidal wetlands/watercourses that DEEP authorizes should require compensation to accommodate for the adverse impact called compensatory mitigation.

Inland wetland impacts are regulated by municipal commissions, and inland wetlands can currently be authorized to be impacted at the municipal level without any compensation. Current law for CT inland wetlands is not preservation policy. Municipalities are supposed to consider compensation. DEEP regulates only state activities and state lands for inland wetlands, and issues 401 Certifications for bigger Federal 404 projects. Comments regarding inland wetlands, should be directed to the municipality about impact levels and/or wetland bylaws. Interested parties may file a formal complaint about inland wetland problems on the LWRD Enforcement (ct.gov) Complaint Intake Form (2020) if they wish to do so. There is a current bill in front of CT legislature, pertaining to making mandatory setbacks for streamside buffers –call your legislator if you would like to support this bill.

A Citizens Guide to Participating in the Municipal Regulation of Inland Wetlands and Watercourses

Overview of the Inland Wetland and Watercourses Municipal Permitting Program

Inland Wetlands Citizen Information

Water Pollution Control Facilities

Comment #11
Locate all waste treatment processing facilities away from water.

Response:
When municipal wastewater plants were originally built in Connecticut decades ago, it was common practice to locate these facilities near the rivers/streams receiving the treated

effluent discharge. Today, the cost to relocate one wastewater plant would be on the order of hundreds of millions of dollars, depending on the level of treatment required for that waterbody. Therefore, in order to decrease the number of wastewater treatment plants, the Department encourages regionalization wherever possible.

Chloride / Green Snow Pro

Comment #13
The University of Connecticut Environmental Health & Safety Department is very concerned with non-point source pollution especially that from stormwater runoff and from road salt. We are hoping DEEP makes this a priority issue going forward.

Comment #21
The locations that I will be sampling are mainly large capacity runoffs which feed into our streams and rivers from state roads such as RT-195, RT-198 and RT-44. At these locations I will be mainly concerned with the conductivity levels for these areas related to the salt contamination from application in the winter for ice and snow.

Response:
Thank you for your comments. A work group has been developed in the Bureau of Water Protection and Land Reuse to communicate efforts among DEEP programs to work more effectively to manage this issue. The Department work group is currently collaborating on creating a new webpage to include more information on the environmental impacts of excessive salt applications. In the meantime, a Story Map has been developed to communicate the implications and challenges that excessive salt applications create for homeowners, public health, and the environment titled, Road Salt: More Than Just a Grain of Salt (arcgis.com). Other DEEP published resources include a page of Road Salt FAQs (ct.gov) and a page dedicated to the DEEP Remediation Division's investigation process for private drinking water wells impacted by salt.

The Department is also working with other state agencies, including the Department of Transportation, UCONN (T2 Center & CLEAR), and the Department of Public Health to organize and evaluate ways to teach the public the importance of reducing chlorides in the environment that are impacting surface/ground water in CT. CTI | T2 Center (uconn.edu)

In addition, the Department's Monitoring and Assessment program and the United States Geological Survey (USGS) collects chloride and conductivity data in CT, Rhode Island and Massachusetts. CT DEEP and the USGS agree that Chloride is of interest because high concentrations may affect aquatic life in streams, and/or affect the quality of reservoirs and groundwater aquifers used for public, or private, drinking water. Data collected by the USGS, and the Department have indicated excessive chlorides can increase concentrations of naturally occurring minerals (such as calcium and magnesium) and metals (such as iron and manganese) and increase the corrosivity in groundwater. While calcium, magnesium, and iron are associated with aesthetic issues, high concentrations of manganese can be harmful to the nervous system. The increased corrosivity of groundwater can also release harmful metals

from household plumbing such as lead. These changes in the groundwater quality used as a water supply source can introduce potential health and infrastructure risks to CT residents, so the Department, along with the other state agencies, share concerns about the long-term risks of excess chloride in the environment to CT drinking water.

As new WQAPs are developed, addressing chloride will be evaluated for inclusion in the plan is data is available to indicate that chloride may be impacting water quality in the plan area.

Emergency Spill Notification

Comment #22
The first thing that comes to mind is communication i.e.: prompt notification to the Windham Water Works whenever there is a spill, emergency, catastrophic event within our watershed that may impact our surface water quality.

Response:
Thank you for your comment. The Department is currently working on improvements for the release notification and reporting software platform. The State Emergency Response Commission and Emergency Planning and Community Right-to-Know Act (EPCRA) program Director will contact directly to discuss. Specifically, the Department is working on customizing incident reporting and notification platform to provide direct notifications to water companies and authorities to provide direct notice to them of spills that occur in their watershed or source water/aquifer protection area. This involves providing those GIS layers to our software platform provider. The Department of Public Health and CT DEEP GIS Coordinator are working in collaboration with this effort as well. The Department anticipates this direct notification feature and special role for watershed managers being operational in the next 2-3 months and aiming to be implemented by the Fall.

Invasive Plant Species

Comment #23
One last topic I have is the health and water quality in Mansfield Hollow Lake. I have patrolled and observed the Lake multiple times within the last year and have noticed the extremely rapid growth of the two Milfoil Species and Water chestnut. I haven't heard of any future control or action being taken on these two extremely invasive aquatic species yet. I just know that if no action is taken soon, we will continue to lose the capacity of that reservoir at a rapid rate.

Response:
Thank you for your comment. CT DEEP has information on invasive aquatic plant species and practices to implement to reduce their spread. Also, please see the Grants for the Control of Aquatic Invasive Species webpage for information on grant applications to help address this issue. For more information you can contact matthew.goclowski@ct.gov.

Water Quality Monitoring

Comment #24
Another topic that is important is our water quality monitoring. Soon, I will be conducting river sampling in specific locations in our watershed. I will be looking for excessive amounts of sodium, nitrogen, nitrates, coliforms, etc. We currently can sample and test PH, LDO, temperature, oxygen saturation and conductivity.

Response:
Thank you for your comment and for monitoring water quality in CT! Please contact walter.tokarz@ct.gov to coordinate data efforts. For the DEEP to accept data, it must follow a Quality Assurance process. For more information, please refer to the Quality Assurance (ct.gov) website.

Tiered data quality considerations for assessments of the State's waters Tier 1- Data typically are in the form of digital photos or written descriptions of observations. These data can be helpful as a record of an episodic event. Tier 1 data are not likely to provide sufficient information to formalize an assessment but can provide supporting information when other data exists for a waterbody. Tier 2- Data collected may not have been collected under a formal Quality Assurance Project Plan (QAPP). Tier 2 data are not likely to be enough information to formalize an assessment but can provide supporting information when other data exists for waterbody. Tier 3- Data are collected under a formal monitoring plan which follows a QAPP approved by CT DEEP or US EPA. QAPPs shall include laboratory tests to be used and data quality objectives. Standard Operating Procedures for field procedures and lab techniques should be explained as well as a plan for data management. Chemistry results should be provided from a state-certified laboratory. Taxonomic identifications should be from a taxonomist with sufficient experience to provide reliable taxonomic identifications, preferably with certifications by the Society for Freshwater Science and American Fisheries Society. Project objectives should be consistent with CT DEEP's use of data for waterbody assessment purposes. Tier 3 data may be used to support use assessment

1,4 Dioxane

Comment #25
I would recommend including 1,4 Dioxane to be monitored and/or surveyed in CT water bodies that are being evaluated. 1,4 Dioxane has been identified as a likely human carcinogen.1,4 Dioxane is a forever chemical. It may be present in our water, because of its chemical and physical characteristics. It is a very small molecule that does not stick to soil particulates and can move into groundwater. It is in many common household products such as shampoos and laundry detergents and therefore maybe entering the environment through wastewater, and septic tanks. Because -1,4 Dioxane is a byproduct in process production, it is not included as an ingredient on any products that contain it and therefore people cannot know to avoid using products containing it.

Response:

Thank you for your comment. A narrative standard applies to -1,4 dioxane in the Connecticut Water Quality Standards. CTDEEP has procedures to develop numeric water quality criteria based on this narrative standard and water quality criteria recommendations from EPA to provide numeric water quality criteria for use at sites when there is not an existing numeric water quality criteria established in the Water Quality Standards, providing sufficient information is available. Through regulated implementation actions, chemicals that may be present at a site are identified and would be addressed through a remedial activity or a permit. Recommended criteria have been developed using these procedures for 1,4 dioxane and are available in the Technical Support Document: Recommended Numeric Criteria for Common Additional Polluting Substances and Certain Alternative Criteria. These criteria may be updated periodically.

Section 22a-426-4(a)
(5) Surface waters and sediments shall be free from chemical constituents in concentrations or combinations which will or can reasonably be expected to result in acute or chronic toxicity to aquatic organisms or otherwise impair the biological integrity of aquatic or marine ecosystems outside of any dredged material disposal area or areas designated by the Commissioner for disposal or placement of fill materials or any zone of influence allowed by the Commissioner, or bioconcentrate or bioaccumulate in tissues of fish, shellfish and other aquatic organisms at levels which will impair the health of aquatic organisms or wildlife or result in unacceptable tastes, odors or health risks to human consumers of aquatic organisms or wildlife as determined by the Commissioner unless such sediments are capped with material suitable for unconfined, open water disposal as an appropriate means of ensuring consistency with this standard as approved by the Commissioner in writing. In determining consistency with this Standard, the Commissioner shall at a minimum consider the numeric criteria listed in Table 3 of section 22a-426-9 of the Regulations of Connecticut State Agencies and any other information the Commissioner deems relevant.

Waterbody: Baker Cove

Comment #26
I would like to formally submit the Baker Cover Watershed in Groton CT for consideration in CT DEEP's Integrated Water Planning Management process.

Response:
Thank you for your comment. There are efforts to improve water quality in the Baker Cove area and the development of a watershed-based plan has already been completed. Although DEEP would encourage further implementation efforts, there are currently two 319-funded projects from the Baker Cove Watershed Based Plan.

One is a multi-year 319-funded project with Eastern Connecticut Conservation District (ECCD): Baker Cove-Birch Plain Creek Stormwater Improvement Project, which includes work at multiple sites within an apartment complex to implement stormwater best management practices (BMPs) to reduce the impacts of stormwater runoff from discharging directly into receiving waters and reduce the pollutant load transport. BMPs include rain gardens, tree

filters, catch-basin filtration, and hydrodynamic separator units. That project has been initiated and is slated to conclude sometime in 2025.

A second 319-funded project in the Baker Cove area is in a planning phase with project partners for BMPs intended for bio-retention and infiltration of water to reduce the impacts and pollutant load transport of stormwater runoff from discharging directly into receiving waters.

The Department also provides Section 319 NPS Grant funding for ECCD to conduct "technical assistance" which includes assisting homeowners and municipalities in their watersheds and can also include sitting on committees. ECCD leads the Baker Cove Watershed Committee; their duties in administering the watershed committee duties include identification and development of partners, meeting preparation, meetings, agendas, minutes, work plan and outreach material.

Further, The Connecticut National Estuarine Research Reserve is collecting pathogen data this summer. The data will be collected and submitted to the CT DEEP Monitoring and Assessment program for analysis.

Waterbody: Avery Pond

Comment #27
I request that Avery Pond is added to the list of water quality priority areas in the Integrated Water Planning Management Phase II report.

Avery Pond, Preston (comment from the 2022 IWQR)

Close up image of a cyanobacteria bloom captured on the western shore of Avery Pond on September 30, 2021.

Avery Pond volunteers, in partnership with The Last Green Valley Volunteer water quality monitoring program has been participating in the EPA Cyanobacteria Monitoring Collaborative program in 2020 and 2021. Cyanobacteria blooms have been documented in the lake and reported to the CMC via the Bloom Watch app, and water samples assessed for microcystin levels in a cyanobacteria film along the western shoreline of the lake. These values were just below the threshold for safe recreation. Previously, summer sampling analysis for TP, TN, secchi depth and Chlorophyll A data was collected and submitted to CT DEEP. This data suggests the lake trophic status parameters in Avery Pond to be crossing into the Highly Eutrophic range in 2014 and 2015. We believe additional monitoring in Avery Pond by CT DEEP is warranted. See image in Figure 1 below for representation of a cyanobacteria bloom recorded on September 30, 2022.

Response:
Thank you for your comment. The CT DEEP Monitoring and Assessment Program is collecting

data here during the summer of 2025.

Nutrients in Lakes

Comment #39a
Regarding other lakes, we believe a focus on nutrients would provide a guide to help other smaller lakes initiate their water quality improvement efforts in an effective and efficient manner.

Response:
CT DEEP has developed a Statewide Lake Nutrient TMDL to address impacts on water quality in lakes from excess nutrients. The Connecticut Statewide Lake Nutrient Total Maximum Daily Load Core Document has information on identifying nutrient sources and actions that could be taken to reduce the impact of nutrients on lakes. CT DEEP has completed a nutrient plan for Bantam Lake (Bantam Lake Watershed TMDL) and will develop similar plans for other lakes as resources and information allows.

Waterbody: Yantic River

Comment #28
The Eastern Connecticut Conservation District recommends that DEEP consider making the Yantic River a priority area in the 2024 IWPM Phase II process.

Response:
Thank you for your suggestion. At this time, we do not have plans for developing a water quality action plan for the Yantic River. We will keep this waterbody in mind for the development of a plan in the future as resources and information allow.

The unnamed tributary to Yantic River (Norwich Landfill)-01 (CT3900-00_trib_01) is listed for an Aquatic Life Support impairment due to historic disposal of sewage sludge and leachate from the Norwich landfill. CT DEEP issued an order to the Town of Norwich to remediate the site surrounding the landfill. The Town received a grant from the CT DEEP to develop remediation design plans and conduct the remedial work. However, the Town's consultant used all the funds for the design plan, which have not been completed. As a result, the CT DEEP referred the consultant to the State auditor.

Segments CT3900-00_01 and CT3900-00_02 are both assessed as insufficient for recreational and fish consumption uses and are both supporting the designated use for habitat for fish, aquatic life and wildlife.

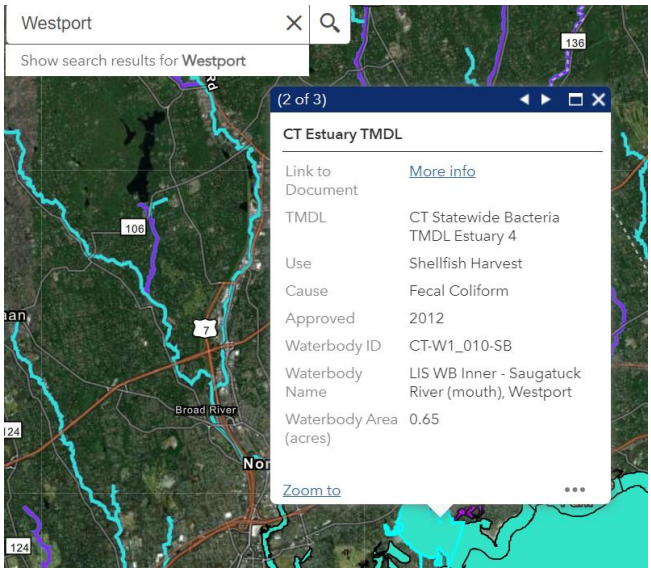
Waterbodies in Westport

Comment #48
Westport's waters and stream remain above the DEEP geomean limits, indicating

unacceptable bacteria levels.

Response:

Thank you for your comment. There is a Bacteria TMDL for Recreation scheduled to be public noticed this fall/winter for the Muddy River in Westport. Additionally, there are several bacteria TMDLs already in place in Westport. There is an interactive map viewer on the Integrated Water Quality Report webpage which displays all of CT's assessed waters and TMDLs. Type Westport in the search bar and the blue-green areas are where there is a TMDL in place. If you click on the waterbody, there will be a pop-up that gives you the name of the TMDL the parameter (bacteria type) and a link to the TMDL (more information).



https://ctdeep.maps.arcgis.com/apps/webappviewer/index.html?id=71d4cd5834514c279ff7b7009d17b47f

On the CT DEEP TMDL webpage https://portal.ct.gov/deep/water/tmdl/total-maximum-daily-load
You can also access all our approved TMDLs to date. Including the Statewide Bacteria Core Document https://portal.ct.gov/-/media/deep/water/tmdl/ctfinaltmdl/stwdbact_tmdl_corefinal,
where you can find actions that can be taken to reduce bacteria levels in surface waters.

There are also 2 Watershed Based Plans (WBP) in Westport. The Saco Brook WBP https://portal.ct.gov/-/media/deep/water/watershed_management/wm_plans/sascobrookwbpabridgedpdf.pdf and the Saugatuck WBP https://portal.ct.gov/-/media/deep/water/watershed_management/wm_plans/saugatuckwatershedplanfinalpdf.pdf.

Funding for Implementation

Comment #29

ECCD staff has been referring to [the IWPM Phase I] priority watershed map as we have been applying for grants to support preparing Watershed Based Plans. As a result, ECCD was funded to prepare the Natchaug River Healthy Watershed Protection Plan and the Anguilla Brook/Inner Wequetequock Cove Watershed Based Plan. Now that those watersheds have implementation plans, should we be requesting for them to remain priority areas for funding implementation projects? Same question about the Niantic River, which has an updated

watershed-based plan. Will the Phase I priority areas remain priority areas in Phase II if the water quality hasn't been restored?
Also, with NRCS National Water Quality Initiative Planning funds, ECCD prepared an updated plan for Little River in Woodstock, Putnam, Thompson, and Pomfret. We believe that the NQWI designation by NRCS will be restored for Little River once the plan is given final approval by NRCS. If Little River is a NQWI watershed, should it also be considered a priority watershed in Phase II of the IWPM?

Response:
Thank you for your comment. Waters that have existing water quality action plans or plans in development remain a priority. For the Natchaug Watershed and the Pawcatuck Watershed, CTDEEP has water quality action plans in development. Those waters would still be eligible for application for grants, although funding is not guaranteed.

Waterbody: Lakes Lillinonah, Lake Zoar, Twin Lakes & Lake Waramaug

Comment #38
For Lake Lillinonah, a focus on nutrients, climate change, and stormwater and non-point source aligns with our mission. Other lakes that we would suggest as a priority for IWPM II would be the Twin Lakes and Lake Waramaug.

Comment #40
We believe the stakeholder organizations and groups in the Upper Housatonic Watershed can work together to initiate projects that could be used to exemplify the benefits state-supplied Action Plans can provide.

Response
Thank you for your comment. There are nutrient TMDLs in the queue for Lakes Lillinonah and Zoar. Currently, there are no plans in development for Lake Waramaug or Twin Lakes. However, it is a possibility that they could be added to the Statewide Nutrient TMDL in the future. Please submit data to walter.tokarz@ct.deep and Rebecca.jascot@ct.gov, please also provide a QAPP (see response to comment #24.) Work is currently underway in Lake Zoar and Lake Lillinonah to establish TMDLs for nutrients in the Housatonic River Watershed. The Department agrees that building partnerships with stakeholders is essential for Water Quality Action Plan development. Thank you for your partnership with us!

Non-Point Source Planning

Comment #4:
I would like to request that Tuttle Brook and the area where it empties into Long Island Sound be added to your list of focus areas for your water quality program. The Environmental Assessment for the Tweed Airport expansion was recently accepted. There continue to be many concerns in the surrounding Environmental Justice communities about the expansion's effect on the water quality that were not thoroughly investigated. Lighthouse Point Park is an important recreation and fishing area and thriving oyster beds were recently discovered in that

area. Cosey beach, Fort Hale Park, and other shoreline areas are sure to be affected. Runoff, flooding, deicing procedures, disturbance of the soil during construction are all non-point sources of pollution.

Comment #41

Stormwater and non-point nutrient sources would be third on the priority list for FOTL. Lake Lillinonah shares its shores with six municipalities; New Milford, Bridgewater, Brookfield, Newtown, Southbury, and Roxbury, which are not all MS4towns. Unfortunately, many municipalities upstream from Lillinonah are also not MS4 towns. Additionally, we have numerous non-point sources and Concentrated Animal Feeding Operations (CAFO's) located in the upper watershed that contribute nutrients to the system. Therefore, a TMDL for Total Suspended Solids (TSS) would be helpful. In our monitoring we have never tested for TSS, but we do track lake color. Usually following events like the one pictured above cause the color of the lake to be brown for many days if not weeks.

Response

Thank you for your comments. Controlling stormwater and nutrients are important actions to address water quality. Controlling TSS is an important part of stormwater management and the associated impacts the pollutants it carries with it has on WQ. As we develop nutrient TMDLs for Lakes, including Lillinonah and Zoar, we can evaluate information on TSS to determine if there is sufficient information to development recommendations for TSS as part of developing the TMDL.

In addition, The Watershed Program at DEEP is currently working on releasing an updated Nonpoint Source Plan to address various NPS issues in the state. Stay tuned for the updated version of this document coming soon (https://portal.ct.gov//media/deep/water/nps/2019ctdeepnonpsplanpdf.pdf). The MS4 permit is also currently being updated by the Stormwater Program at DEEP, the current permit expires on September 30, 2025. Each time the MS4 permit is renewed, additional municipalities are considered for inclusion based on current census data. The CT DEEP Statewide Bacteria Core Document suggests, "For municipalities that continue to be unregulated by the MS4 Permit, CT DEEP recommends that municipalities implement the six minimum measures specified in the MS4 permit to the extent possible. Measures such as public education and outreach, public involvement and participation, construction site stormwater runoff control, post-construction stormwater management, and pollution prevention/good housekeeping can be implemented to achieve improved stormwater quality without a significant cost".
As a requirement of the General Permit for Concentrated Animal Feeding Operations (CAFO GP) registered Concentrated Animal Feeding Operations are required to operate and manage their wastewater in accordance with their site-specific Comprehensive Nutrient Management Plan to minimize impacts to nearby waterways.

New Drinking Water Sources

Comment #42

State Healthcare would like to develop public and private residential care facilities or congregate housing communities with FDA approved spring water for hygiene and consumption purposes in comparison to a reservoir. Most springs are naturally carbonated, and no two springs taste exactly alike, each spring has its own distinct mineral makeup and resulting flavor profile. Purported health benefits include clearing skin, helping digestion, even strengthening blood, vary from spring to spring. The FDA defines spring water as derived from an underground formation from which water flows naturally to the surface. This water must be collected only at the spring or through a borehole that taps the underground formation feeding the spring. If some external force is used to collect the water through a borehole, the water must have the same composition and quality as the water that naturally flows to the surface (www.findaspring.org).

Response
Thank you for your comment. Please contact the Department of Public Health's Drinking Water Section (https://portal.ct.gov/dph/drinking-water/dws/contact-information.)

Coordination Between Agencies

Comment #43
The current process is split unnecessarily over four agencies, as well as numerous committees and groups, with limited collaboration or understanding of the big picture. As a result, progress is slow. The 2018 State Water Plan was limited in its ambition, and its implementation so far has been disappointing. Issues like water quality, greywater, Governance, innovation, and technology remain largely ignored.

Response
Thank you for your comment. Over the last two years, there has been a significant turnover in Agency staff due to the large number of retirements in 2022. As a result of that, there have been many changes to Agency leadership and administrative processes. Since COVID 19, various means of communication (TEAMS, ZOOM, SharePoint among others) have greatly improved networking and collaboration among CT Agencies. DEEP Commissioner Katie Dykes is working to improve the transparency, predictability, and efficiency of DEEP's regulatory programs. The Commissioner's 20by26 initiative continues to work towards this effort across DEEP Bureaus and programs.

Streamflow

Comment #46
Even with some large, private water systems, the state's limited knowledge remains self-reported and unverified, which has significant consequences. Hundreds of millions of dollars are being spent on untested, vague assumptions. For instance, the expenses argued with the new streamflow regulation have been unexpected to state agencies.

Response

Thank you for your comment. The regulated community was provided 10 years to plan and budget for the stream flow releases required under the regulation. Fiscal impacts were reviewed and considered by the legislative regulations review committee during the development of the regulation.

Staffing

Comment #47
Connecticut's water management is driven by volunteers and guided by the water industry. We need more dedicated, independent staff with deep knowledge of various subjects.

Response
Thank you for your comment. All positions in the State of CT are managed by the Department of Administrative Services and the Office of Policy and Management. As a result of the many retirements, many positions have been filled and there are many new staff that have joined the DEEP team over the last 2 years.

Water Management and Water Advocacy

Comment #50
Change in water management is relatively easy. Unlike any other sector or industry, change in investments can be mandated. As noted above, residents would support change. All it takes is a different approach to water advocacy.

Response
Thank you for sharing your thoughts on this issue.

Summary

The Department has solicited and considered public comment on water quality planning priorities under Section 303(d) of the Clean Water Act. As a result, the Department in incorporating the following changes into the Prioritization Framework document:

- Enhancing Focus on Stormwater and Non-Point Source Management
- Enhancing Focus on Swimming and Shellfishing Bacteria TMDLs
- Enhancing Focus on Nutrients in Lakes and Embayments
- Enhancing Focus on Aquatic Life, Fish and Wildlife Health
- New Partnerships to Focus on Environmental Health for All Communities
- Improving Partnerships to Protect Drinking Water Resources

APENDIX A. Original Comments submitted on Integrated Water Planning Management 2
The Department thanks you all for your comments.

Table of Commenter's comments, name and affiliation. Links to original comment submittals are linked by name in the second column.

Comment #	Original Comment Letter Link	Topics	Affiliation
1-3	Paul Aresta	Climate Change, Environmental Justice, Public Water Supply-Protection	Council on Environmental Quality, Executive Director
4	Katherine Bennet	Tuttle Brook / New Haven Harbor	East Haven, Resident
5-11	Laura Cahn	Pesticides, Artificial Turf, Water Conservation, Single Use Containers, NPS Pollution, Wetland Preservation, Wastewater Treatment Facilities	New Haven, Resident
13	Jim Hutton	Chloride	Environmental Health & Safety Department, UConn
14-20	Valerie Seiling Jacobs	Artificial Turf, Chloride, NPS Pollution Management, Pesticides, Public Water Supply-PFAS, Water Conservation	Westport, Resident
21-24	Tyler Johnson	Chloride, Emergency Spill Notification, Invasive Plant Species, Water Quality Monitoring	Environmental Technician, Windham Water Works
25	Iris Kaminski	1,4 Dioxane	New Haven, Resident
26	Cierra Patrick	Baker Cove	Economic Development Manager City of Groton
27-29	Jean Pillo	Implementation Funding, Avery Pond, Yantic River	Watershed Project Manager, Eastern Connecticut Conservation District
30-31	Denise Savegeau	Climate Change, Public Water Supply-protection	Chair, Connecticut Council on Soil and Water
32a-33	Toni Simonetti	Artificial Turf, Pesticides, Public Water Supply-PFAS	Westport, Resident
34	Jill Totenburg	Artificial Turf	Westport, Resident
35-37	Ian Warburg	Artificial Turf, Pesticides, Water Conservation	Westport, Resident, Save Westport Now, Co-Chair, The Aquaya, Chair
38-41	Rebekah White	Climate Change, Nutrients, Lake Lillinonah, Twin Lakes, Lake Waramaug, Upper Housatonic Watershed Partnership, TSS	Friends of the Lake
42	Shauna	New Drinking Water Resources	State Health Care

Comment #	Original Comment Letter Link	Topics	Affiliation
	Williamson		
43-50	Marc Lemcke	Bacteria, Interagency Communication, Public Water Supply – PFAS, Staffing, Water Management, Advocacy, Water Quantity, Public Water Supply-Protection	Westport, Smarter Water

PUBLIC COMMENTS

Paul Aresta, Council on Environmental Quality, Executive Director

Comment #1:

The Council supports increased emphasis on water quality issues that could impact Environmental Justice communities; however, it is unclear how this would be done and what "robust emphasis" means. The Council suggests that DEEP coordinate with Connecticut Equity and Environmental Justice Advisory Council (CEEJAC) and especially the CEEJAC Water Subcommittee.

Comment #1a:

The Council also supports increased focus on improving water quality to allow for swimming in publicly accessible water bodies within or near Environmental Justice communities, such as Batterson Park Pond that could, with improved water quality, serve as a public cooling space, given the projected increase in temperatures associated with climate change.

Comment #2:

The Council also strongly supports inclusion and consideration of potential impacts to water quality associated with climate change. As discussed in the Council's annual report, Environmental Quality in Connecticut, "it is predicted that as the climate warms, severe weather events, such as drought conditions and extreme rainfall will become more frequent".

Comment #3:

Lastly, the Council notes that over two-thirds of the population served by community public water systems (PWS), which is estimated to be approximately 2.5 million residents, are supplied by surface water sources with groundwater sources supplying the remaining community PWS population and most private wells. Although DEEP is recommending refining the topics that were previously outlined in IWPM phase 1 and not introducing any new topics, the Council recommends that DEEP include 1) enhanced focus on the protection and improvement of water sources that provide for safe drinking water, and 2) more emphasis on land use controls (i.e. zoning, setbacks, low impact development) to help protect water supply watershed lands.

Katherine Bennet, East Haven, Resident

Comment #4:

I would like to request that Tuttle Brook and the area where it empties into Long Island Sound be added to your list of focus areas for your water quality program. The Environmental

Assessment for the Tweed Airport expansion was recently accepted. There continue to be many concerns in the surrounding Environmental Justice communities about the expansion's effect on the water quality that were not thoroughly investigated. Lighthouse Point Park is an important recreation and fishing area and thriving oyster beds were recently discovered in that area. Cosey beach, Fort Hale Park, and other shoreline areas are sure to be affected. Runoff, flooding, deicing procedures, disturbance of the soil during construction are all non-point sources of pollution.

Laura Cahn, New Haven, Resident

Comment #5:

Ban pesticides except for extreme circumstances when no alternative exists.

Comment #6:

Ban artificial turf, multi-layer plastic surfaces that leach water- containing PFAS and other toxic chemicals.

Comment #7

Limit irrigation of lawns and gardens to conserve as much water as possible.

Comment #8

Ban nips (mini one-serving plastic and glass liquor bottles) so people cannot throw the empty containers into water bodies and storm drains.

Comment #9

Ban leaf blowers. They spread pesticides, heavy metals, oil, gas, and other toxins that pollute our water.

Comment #10

Limit construction on and paving over wetlands to preserve as much of our pristine, toxin-filtering eco-system as possible.

Comment #11

Locate all waste treatment processing facilities away from water.

Jim Hutton, Environmental Health & Safety Department, UConn

Comment #13

The University of Connecticut Environmental Health & Safety Department is very concerned with non-point source pollution especially that from stormwater runoff and from road salt. We are hoping DEEP makes this a priority issue going forward.

Valerie Seiling Jacobs, Westport, Resident

Comment #14

Artificial turf leaches toxic PFAS (or "forever") chemicals into the water supply. In fact, PFAS compounds are also found in other types of infill, as well as in the blades and backing of the turf. And these compounds accumulate in the human body and are toxic especially for

children and pregnant women.

Comment #15
Artificial turf is a huge source of microplastics, both from the degradation of the infill and backing, as well as the breakdown of the blades. And this plastic, which is also a health hazard, is also winding up in our waterways, in our water supply, and in our bodies.

Comment #16
Artificial turf also contributes to climate change. Unlike natural grass, which absorbs carbon dioxide (CO2), artificial turf does the opposite: it releases CO2, as well as methane and other chemicals. Indeed, it is now estimated that a 2-acre artificial turf field generates55.6 metric tons of CO2 over its useful life (i.e., 10 years).

Comment #17
Require water companies to remove PFAS from the water supply. Many water companies are aware of the presence of PFAS chemicals in the water they supply, as well as the dangers posed by these chemicals, but they are currently not required to do anything about it.

Comment #18
Tighten the Rules on the Use of Pesticides & Herbicides. Regulations governing the use of pesticides and herbicides in Connecticut must be tightened, especially for properties that are above aquifers and those that abut or are near rivers, streams, or other bodies of water (e.g. Longshore Park in Westport, as well as other golf courses and properties with large lawns).

Comment #19
Mandate the Adoption of Gray Water & Sustainable Initiatives. With our supply of potable water dwindling due to periodic droughts and high demand, we cannot afford to squander it on golf courses and the like. We need to require the installation of Gray Water recovery systems which will allow us to irrigate outdoor spaces without depleting a scarce and valuable resource.

Comment #20
Phase Out the Use of Gas-Powered Lawn and Garden Equipment. A number of towns in the state is already regulating the use of gas-powered leaf blowers, which are probably the most egregious tool in the landscapers' arsenal, at least when it comes to pollution.

Tyler Johnson, Environmental Technician, Windham Water Works

Comment #21
The locations that I will be sampling are mainly large capacity runoffs which feed into our streams and rivers from state roads such as RT-195, RT-198 and RT-44. At these locations I will be mainly concerned with the conductivity levels for these areas related to the salt contamination from application in the winter for ice and snow.

Comment #22
The first thing that comes to mind is communication i.e.: prompt notification to the Windham

Water Works whenever there is a spill, emergency, catastrophic event within our watershed that may impact our surface water quality.

Comment #23

One last topic I have is the health and water quality in Mansfield Hollow Lake. I have patrolled and observed the Lake multiple times within the last year and have noticed the extremely rapid growth of the two Milfoil Species and Water chestnut. I haven't heard of any future control or action being taken on these two extremely invasive aquatic species yet. I just know that if no action is taken soon, we will continue to lose the capacity of that reservoir at a rapid rate.

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Iris Kaminski, New Haven, Resident

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I would recommend including 1,4 Dioxane to be monitored and/or surveyed in Ct water bodies that are being evaluated. 1,4 Dioxane has been identified as a likely human carcinogen.1,4 Dioxane is a forever chemical. It may be present in our water, because of its chemical and physical characteristics. It is a very small molecule that does not stick to soil particulates and can move into groundwater. It is in many common household products such as shampoos and laundry detergents and therefore maybe entering the environment through wastewater, and septic tanks. Because -1,4 Dioxane is a byproduct in process production, it is not included as an ingredient on any products that contain it and therefore people cannot know to avoid using products containing it.

Ciera Patrick, Economic Development Manager City of Groton

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Jean Pillo, Watershed Conservation Project Manager, Eastern Connecticut Conservation District

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Comment #29

ECCD staff has been referring to [the IWPM Phase I] priority watershed map as we have been applying for grants to support preparing Watershed Based Plans. As a result, ECCD was funded to prepare the Natchaug River Healthy Watershed Protection Plan and the Anguilla Brook/Inner Wequetequock Cove Watershed Based Plan. Now that those watersheds have implementation plans, should we be requesting for them to remain priority areas for funding implementation projects? Same question about the Niantic River, which has an updated watershed-based plan. Will the Phase I priority areas remain priority areas in Phase II if the water quality hasn't been restored?

Also, with NRCS National Water Quality Initiative Planning funds, ECCD prepared an updated plan for Little River in Woodstock, Putnam, Thompson, and Pomfret. We believe that the NQWI designation by NRCS will be restored for Little River once the plan is given final approval by NRCS. If Little River is a NQWI watershed, should it also be considered a priority watershed in Phase II of the IWPM?

Denise Savegeau, Chair, Connecticut Council on Soil and Water

Comment #30

Source water protection is focused on addressing nonpoint source pollution through watershed management measures, and this is where DEEP needs to play a critical role supporting the work of DPH and the Water Planning Council in protecting our state's drinking water supplies. DEEP does have authority over the drinking water supplied by aquifers and prioritizes Aquifer Protection Act areas in many of its documents. It needs to do the same for surface water supplies by including drinking water supply and source water protection as a priority in the IWPM.

Comment #31

Climate change is impacting water resources across our state both in terms of water quality and quantity, including our drinking water supplies. More than ever, Connecticut will be relying on our working and natural lands to provide nature-based solutions to address water resource concerns. Although the CWA does not address water quantity per se, the relationship between water quantity and water quality is important. This is critical as we address emerging issues such as harmful algal blooms. Additionally, with source water protection watersheds being a subset of watersheds draining to Long Island Sound, prioritizing them for action also directly protects the integrity of the Long Island Sound.

Toni Simonetti, Westport, Resident

Comment #32a

I urge that towns be mandated to clear our water supply of PFAS.

Comment #32b

I further advocate for a ban on substances such as artificial turf in Connecticut.

Comment #33

I am additionally concerned about the levels of toxic pesticides and herbicides in use in large swaths of land such as golf courses, athletic fields, and the like. I would like municipalities to be banned from using such substances on public lands. I know there are restrictions in place for individual consumers, who can no longer purchase many substances, yet these are used in large quantities by licensed applicators to public lands where we gather.

Jill Totenburg, Westport, Resident

Comment #34

I am writing with an urgent request. I have seen the data on the issues around PFAs and Astroturf and how harmful it is. I also know that many municipalities are considering using it for playing fields for our most vulnerable residents – our children!

Ian Warburg, Westport, Resident, Save Westport Now, Co-Chair, The Aquaya, Chair

Comment #35

Artificial Turf: It is a public health imperative that we halt the installation of artificial turf to prevent: (i) the leaching of PFAS ("forever") chemicals into our water supplies; and (ii) the leaching of micro-plastics into our water and the environment.

Comment #36

Pesticides & Herbicides: Regulations governing the use of pesticides and herbicides must be strengthened, especially for properties that are above aquifers, and those that abut or are near rivers, streams, or other bodies of water (e.g. Longshore Park in Westport, as well as other golf courses and properties with large lawns). Chemical pollution from runoff infiltrates our water sources and waterways and must be mitigated.

Comment #37

Gray Water & "Sustainable" Alternatives: With the supply of potable water being limited due to drought and high demand, when possible, not a drop can our should be used for the irrigation of golf courses and other, similar, sites. Gray Water provides an appropriate opportunity to irrigate without depleting a scarce and valuable resource and minimizes the externalization of environmental and health costs borne by an unsuspecting public. Additionally, reducing, and/or eliminating lawns where possible, and replacing them with other plantings can further reduce the demand for water.

Rebekah White, Friends of the Lake

Comment #38

For Lake Lillinonah, a focus on nutrients, climate change, and stormwater and non-point source aligns with our mission. Other lakes that we would suggest as a priority for IWPM II would be the Twin Lakes and Lake Waramaug.

Comment #39a

Regarding other lakes, we believe a focus on nutrients would provide a guide to help other smaller lakes initiate their water quality improvement efforts in an effective and efficient manner.

Comment #39b

Most importantly, FOTL believes that the formulation of modeling scenarios that reflect the impacts of climate change would help in the development of Action Plans that would be most beneficial.

Comment #40

We believe the stakeholder organizations and groups in the Upper Housatonic Watershed can work together to initiate projects that could be used to exemplify the benefits state-supplied Action Plans can provide.

Comment #41

Stormwater and non-point nutrient sources would be third on the priority list for FOTL. Lake Lillinonah shares its shores with six municipalities; New Milford, Bridgewater, Brookfield, Newtown, Southbury, and Roxbury, which are not all MS4towns. Unfortunately, many municipalities upstream from Lillinonah are also not MS4 towns. Additionally, we have numerous non-point sources and Concentrated Animal Feeding Operations (CAFO's) located in the upper watershed that contribute nutrients to the system. Therefore, a TMDL for Total Suspended Solids (TSS) would be helpful. In our monitoring we have never tested for TSS, but we do track lake color. Usually following events like the one pictured above cause the color of the lake to be brown for many days if not weeks.

Shauna Williamson, State Health Care

Comment #42

State Healthcare would like to develop public and private residential care facilities or congregate housing communities with FDA approved spring water for hygiene and consumption purposes in comparison to a reservoir.

Most springs are naturally carbonated, and no two springs taste exactly alike, each spring has its own distinct mineral makeup and resulting flavor profile. Purported health benefits include clearing skin, helping digestion, even strengthening blood, vary from spring to spring. The FDA defines spring water as derived from an underground formation from which water flows naturally to the surface. This water must be collected only at the spring or through a borehole that taps the underground formation feeding the spring. If some external force is used to collect the water through a borehole, the water must have the same composition and quality as the water that naturally flows to the surface (www.findaspring.org).

Marc Lemcke, Westport, Smarter Water

Comment #43

The current process is split unnecessarily over four agencies, as well as numerous committees and groups, with limited collaboration or understanding of the big picture. As a result, progress is slow. The 2018 State Water Plan was limited in its ambition, and its implementation so far has been disappointing. Issues like water quality, greywater, Governance, innovation, and technology remain largely ignored.

Comment #44

The public has limited knowledge of the status of our water quality and water supply. The regulation of water in Connecticut is behind that of many states in New England, as PFAS shows. The soil surrounding Westport's water storage tanks was highly contaminated.7 Its two large wellfields are above the PFAS limit (4ppt). Westport remains non-compliant with all water-related fire protection standards.

Comment #45

Aquarian Water Company stated that the water crises in Flint, Michigan, and Jackson, Mississippi, are closer than we think in Connecticut. Is the company's statement true or not? It is unclear what state agency can answer that question. Our state's level of system knowledge remains poor.

Comment #46

Even with some large, private water systems, the state's limited knowledge remains self-reported and unverified, which has significant consequences. Hundreds of millions of dollars are being spent on untested, vague assumptions. For instance, the expenses argued with the new streamflow regulation have been unexpected to state agencies.

Comment #47

Connecticut's water management is driven by volunteers and guided by the water industry. We need more dedicated, independent staff with deep knowledge of various subjects.

Comment #48

Westport's waters and stream remain above the DEEP geomean limits, indicating unacceptable bacteria levels.

Comment #49

For instance, irrigation restrictions have accomplished a 20% water usage reduction in the critical summer months - almost immediately when put into place in Southwest Connecticut. So much more is needed and possible (e.g., smart metering, weather-based irrigation control, natural lawns, cisterns, greywater)

Comment #50

Change in water management is relatively easy. Unlike any other sector or industry, change in investments can be mandated. As noted above, residents would support change. All it takes is a different approach to water advocacy.