

## Appendix C-2

### Integrated Water Resource Management: Response to Comments Received (Fall 2019)

As part of Integrated Water Resource Management, in Fall 2019 CT DEEP provided an update to the public on related activities and projects as well as an opportunity for additional public input beyond what was initially solicited in 2016. Comments were received from Save the Sound and Footprints in the Water and are summarized below and a brief response provided. Copies of the comments are included in this appendix.

#### Save the Sound

*Comment Summary: Save the Sound commented on the selection process for prioritizing coastal embayments, requesting that this process be expanded in the future with additional public comment and review opportunities and that additional details on the selection process be provided to allow for greater transparency. Additionally, they requested that Black Rock Harbor be considered for prioritization in the future and provided information on various on-going efforts within that watershed to study and improve water quality.*

CT DEEP Response: CT DEEP will continue to involve the public in setting priorities and selecting waterbodies for plan development. As you know, we have a number of plans that are currently under development and additional areas for plan development have been identified. With our limited resources, these actions are all that we can reasonably accomplish over the next two years. However, as we move forward beyond these projects, we will work with the public to identify additional locations to work in and will strive to provide a clear and transparent selection process.

Regarding Black Rock Harbor, it is exciting to see the number of groups working to improve water quality. CT DEEP has incorporated a water quality-based approach to stormwater management through Integrated Water Resource Management and implementation through the stormwater permits which should also provide improvements to Black Rock Harbor. We will consider Black Rock Harbor in the future when identifying additional areas for plan development.

#### Footprints in the Water

*Comment Summary: Footprints in the Water provided recommendations to focus Integrated Water Resource Management on ecosystem functionality, looking beyond a single pollutant “stressor-response” to holistically consider ecosystem integrity. The approach should integrate physical, chemical and biological traits within a watershed and be evaluated in terms of adaptive capacity. A recommendation was made to simplify the screening of watersheds by focusing on land cover at a fine scale instead of using the Recovery Potential Screening Tool. Additionally, it was recommended that environmental targets should be established based ecosystem functions and focused on land use, particularly for substances such as nutrients that are normally present in healthy ecosystems. These targets could then be translated into an expression of pollutant loads which better reflect the actual pressure on the environment.*

CT DEEP Response: CT DEEP concurs that approaching water quality evaluation and planning is appropriately done on a watershed scale and that in order to be effective, taking a holistic approach provides the highest likelihood of an effective outcome. Additionally, we concur that for substances such as nutrients, using watershed specific targets based on ecosystem responses, such as that measured by dissolved oxygen, water clarity and chlorophyll A, are more appropriate than general statewide or nationally based numeric nutrient

criteria. Within Integrated Water Resource Management, we are striving to put together a sound, scientifically-based approach that, when applied to individual watersheds, will reflect the unique conditions within that watershed and allow for the identification of site-specific nutrient values reflective of the ecosystem and the goals for the watershed as expressed in the Water Quality Standards. Once we have conducted some of these studies, we will be sharing our analysis and recommendations with the public for review and feedback. Additionally, there will be from time to time public meetings to allow the continued discussion of these topics. CTDEEP believes that the approaches being used within Integrated Water Resource Management are consistent with the comments provided by Footprints in the Water. We look forward to a continued dialogue on this topic.