

Comments

2022 Draft Integrated Water Quality Report

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The 2022 Draft Integrated Water Quality Report (Report) is a good starting point to determine the water quality needs of the State water bodies. The Report indicates its data is limited and has not necessarily investigated the data that was collected. The data is from a myriad of different sources, different time frames and quality. While I understand this is the best data available at the time, historic data changes. In some ways for the better and others for the worst. While this is an acceptable method to provide information to EPA and to set goals for the waters of the State of Connecticut, it should by no means be a document to base regulations, permits, etc. on specific waters. Each of these need to be based on professional studies of these bodies of water. See page 44 of the Report. All the water bodies listed should be labeled as to the Tiered data used to make the assessment or the data used to make these assessments need to be published on a public data base accessible to anyone (page 9), this should not be private. It also should be accessible via the Department of Energy and Environmental Protection's (DEEP) website and not have to go through EPA's WQX, unless it is available through DEEP's website.

The Report lists there are 72,509 acres of lakes in the State of Connecticut and has assessment data on 182 lakes. Of the 182 lakes assessed what amount of acreage does that represent? What is the total amount of lakes in Connecticut? According to the internet, we all know how reliable that can be, there are over 3000 lakes. This amounts to having DEEP reviewed assessment on only 6% of the lakes (page 10), using just the number of lakes, not acreage. Only one lake in Manchester has been assessed (Appendix A-2). The water quality assessment for Union Pond aquatic wildlife is "not supporting" and recreation is "insufficient information", while the upstream and downstream water quality of the Hockanum River assessment for aquatic wildlife is "not supporting" and recreation is "not supporting". While I know water quality can change but it would seem unlikely the dammed portion of the river's water quality would be much different than to water entering and leaving it.

The Stream Flow Indicators (page 17) can be useful to determine the biological assessments that may be impacted by hydrologic alteration. The list of information considered to make these assessment leaves out or minimizes human interference (non-consumptive) with the flow. Channelization of stream flows caused by such things as highway projects, flood control, farming, siltation, etc. are not mentioned. A couple of these come to mind such as Park River in Hartford or Trout Brook in West Hartford. Basically, there are very few, if not any, waterways in Connecticut not influenced by human activity. Any flowing water body going through a city or town has a major influence by storm water flow, impervious surfaces preventing ground water recharge, etc. Modern construction practices are starting to change this

however I cannot imagine that it can ever be changed back to the pre-settlement days. Even Native Americans altered the flows for irrigation and fishing. There may be segments of waterway that have not been influenced but it would be hard to break these out. Table 1-4 (page 18) breaks down the stream flow class into 4 classifications, the narrative for these classifications are vague and highly subjective. It does not even include intermittent streams within the classification. In stream flow classification, the regulation includes 18 factors related to the degree of alteration in stream flow, are these factors used in determining where they fit into these classifications?

Determining Causes and Source of Impairment (page 44) states the "Monitoring and assessment data used to determine the attainment of CT WQS and designated uses are generally insufficient to provide specific indication of the cause or sources of impairment or potential sources of stress to a water body." Water bodies need to be studied, therefore generalizations used in the should be noted as such unless the water body has had a comprehensive study. While I can concede the information provided in this document is a good guidance tool, divisive actions warrant a study of the water body. Again, this document should only be used for guidance.

Category 4c non-pollutant (page 48), using the term pollution for flow alteration, stream channelization and invasive species does not seem correct. The title of the subsection also states its non-pollution, so how can a non-pollutant be a pollutant? DEEP does not provide a lot of support for the issues of "flow regime modification", as it provided with other sections, although it states it on page 7, 17 and 18. I believe more assessments are needed in this area.

In all the draft Report will meet the need of the EPA and the requirements of Section 305(b) and 303(d) of the Federal Clean Water Act. It should only be used as a tool while individual assessments are needed for specific remedies of water bodies. Thank you.