State of Connecticut 2024 Integrated Water Quality Report Response to Comments

Summary and Response to Public Comments
December, 2025

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Date

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Contents

Background 3
CT DEEP Response to Comments 3
Domestic Fertilizers and Weed Killers 3
Listings and Delistings 4
Article Published in CT Post 4
PFOS/PFAS 5
Monitoring 6
Water Quality Plans and Implementation Coordination 7
Appendix A: Summary and List of Numbered Comments 8

Background

The Connecticut Department of Energy and Environmental Protection (CT DEEP) published a draft version of the State of Connecticut Integrated Water Quality Report (IWQR) on September 12, 2025 and accepted comments until October 14, 2025. The Report was prepared by DEEP to fulfill requirements of the Federal Clean Water Act under Sections 305(b) and 303(d). The Report was posted on the CT DEEP IWQR website for review and download by interested parties. Paper copies were also made available on request. Letters noticing the availability of these documents were sent to interested parties including citizens; conservation organizations; universities; environmental consulting firms; water supply companies; tribal nations; and federal, state, and local officials. Notices were sent via email in lieu of printed mailings. An informational meeting for the public was held via Zoom on September 17, 2025, presentation slides have been posted on the IWQR website. The notice of the availability of the Report as well as the notice of the informational meeting was published in the Hartford Courant, New Haven Register, Norwich Bulletin, The Day (New London), and Waterbury Republican American. 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. Direct reference to the oral public testimony 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. Original public comments are provided in Appendix A to this document.

CT DEEP Response to Comments

Domestic Fertilizers and Weed Killers

Comment 1:
Recommends banning the usage of domestic lawn fertilizers and weed killers used in large quantities throughout the state, particularly in higher priced properties near bodies of water. Proposes that the state set boundaries within a certain number of miles of key bodies of water to eliminate these fertilizers and pesticides.

Response:
Pesticides must first obtain federal and state registration before they can be sold or used in the state. The Environmental Protection Agency (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.

Listings and Delistings

Comments 2-4:
Pleased that CT6800-00_01 Pomperaug River-01 has been recommended for delisting and CT6802-03_01 Lewis Atwood Brook (Woodbury/Watertown)-01 as fully supporting aquatic life use based on new aquatic life data.
Recommends that CT6802-00_01 Nonnewaug River-01 new listing for Recreation should be prioritized for a TMDL for bacteria.

Response:
The Department thanks you for your support regarding full support and delisted segments. The Department is working to develop TMDLs across the state for bacteria on a watershed basis. Once a segment becomes impaired for bacteria, The Department is required to develop a Water Quality Action Plan and adds it to the list of waterbodies to be included in future plans. Once the TMDL has been developed, the public is notified prior to the public comment period.

Article Published in CT Post

Comment 5:
Inquires about the article that was posted in the CT Post this summer regarding the IWQR. Specifically, the statement in the article: “However, in terms of marine waters, Water Quality in Long Island Sound does not support fish or other aquatic life during the summer months due to low oxygen levels in the marine estuary an, and the bays and inlets along the Connecticut coastline.” Comments, “How can this be true?”

Response:
Long Island Sound is affected by low oxygen levels that occur during the summertime. Low oxygen levels make it difficult for fish and other aquatic life to survive. Slow moving and non-moving animals fail to survive while fish and other mobile species avoid the area with low oxygen. Low oxygen was first documented in Long Island Sound during the 1970’s and became better

understood during the 1990's. In response, a Water Quality Action Plan, the Total Maximum Daily Load for Long Island Sound was adopted in 2001 by the States of CT and NY, and the Federal Environmental Protection Agency. This plan established the framework for nitrogen reductions to ease the low oxygen issue. As a result, significant nitrogen reductions in discharges from wastewater treatment plants have occurred, and both the frequency of low oxygen and the area within Long Island Sound where it occurs have been reduced. This is good news for the health of Long Island Sound. However, because low oxygen conditions still exist, CTDEEP remains committed to improving the health of Long Island Sound, by addressing sources that continue to cause low oxygen levels. This involves working with partners and the regulated community to improve water quality in Long Island Sound.

Helpful links:

Long Island Sound Hypoxia and Nitrogen Control Efforts
2ndGenNitrogenStrategypdf.pdf
Homepage - Long Island Sound Partnership
2024-Hypoxia-Season-Review.knit
Long Island Sound Water Quality Monitoring FAQs

PFOS/PFAS

Comment 6:

Requests more information regarding PFAS/PFOS releases and sampling methods as well as future to assess PFAS/PFOS contamination. Notes that it is unclear if the "listing" for PFOS is based on water sampling, fish tissue analysis, known releases of PFAS substances, or some other data source. The Council supports the sampling and analysis of media for the presence of PFAS substances, which is a persistent pollutant in the environment. The Council suggests that the IWQR include additional information regarding the data collection for PFAS substances and any future plans to assess PFAS contamination in rivers, lakes and estuaries in the state.

Response:

In September 2021, fish tissue and surface water samples were collected from eight waste-receiving waterbodies in Connecticut. The effort was part of a larger study to characterize perfluoro octane sulfonic acid (PFOS) levels in environmental media entering and discharging publicly owned treatment works (POTWs) in Connecticut. Sample locations included a total of ten sites on the Connecticut River (Cromwell and Hartford), Farmington River (Farmington and Windsor), Hockanum River (Vernon), Naugatuck River (Beacon Falls), Pequabuck River (Bristol), Quinnipiac River (Wallingford), Scantic River (Somers), and Still River (Winsted). DEEP analyzed the fish tissue and surface water analysis results. This information was provided to the Department of Public Health (DPH). In June 2023, DPH updated or issued new fish consumption advisories in 11 waterbodies based on their evaluation of the fish tissue results from the POTW study along with other PFOS studies using DPH's recently derived PFOS health risk values.

Waterbody segments were included in the Integrated Water Quality Report (IWQR) that corresponded with the DPH PFOS advisories. Following the consolidated listing methodology in the IWQR, those

waterbody segments were listed as impaired for fish consumption due to PFOS.

This information has been added to the 2024 IWQR.

Monitoring

Comments 7-8:
Notes that Lakes for which no bacteria data exist" should be considered "Fully Supporting", based on the designation criteria in Table 1-9 or if such lakes should be designated as "Insufficient Information."

Notes an increased length of river segments not supporting for recreation from 844 to 947 miles, vs. total length of river segments that are fully supporting decreased from 549 to 487 miles. Suggests a comparison of the previous report if designated use status changes more than 10% of miles/area.

Response:
Connecticut has over 3000 lakes, many of which are difficult to monitor because they are located on private land or are inaccessible. The statement noting that a lake "may be considered Fully Supporting" in some cases means that certain types of recreation are likely supported in some situations. However, an assessment decision is not made without a sufficient amount of data collected for a given waterbody. We will update the report to clarify. The term "Insufficient Information" is reserved for waters where some data was collected but the amount of data is not sufficient to make an assessment decision. Unless data has been collected and evaluated in the IWQR, recreation on any waterbody is considered "Not Assessed".

The Department is happy to report that the recreation data collected to support river assessments during the 2024 cycle included data from two new monitoring initiatives with partner organizations, the "Urban Waters Initiative" and the "LIS Pathogen Monitoring Network." Many of the sites collected as part of these initiatives targeted sites in urban areas of the State. Urban areas contain a large number of impervious surfaces that transport pollutants directly to water bodies through stormwater. This may account for the increase in not supporting and decrease in fully supporting river segment miles. Because recreation data is collected at targeted locations often in urban areas, it is difficult to track trends from cycle to cycle. Aquatic life use assessments in rivers are better suited for trend assessment. The Department uses a specific monitoring approach to be able to assess Statewide conditions in river segments for aquatic life uses every five years. This assessment was included in the 2024 IWQR. For results of that assessment see the "Statewide Assessments using a Probabilistic Sampling Design" in Chapter 2 of the report.

Comments 9-10:
Notes that waters that are "not assessed" have reduced but is concerned that the number of river and lake segments classified as having insufficient information for Aquatic Life continues to increase.

Recommends funding support for local watershed monitoring programs. Emphasizes the need for comprehensive data and sufficient monitoring information. Recommends the review of Massachusetts' Water Quality Monitoring Grant (WQMG) Program to strengthen CT water quality programs

Response:
Connecticut is fortunate to be a water rich State with an estimated 7,772 miles of perennial rivers and 72,509 acres of lakes which presents a challenge to monitor all waters. To address this challenge the Department uses a targeted and probabilistic approach to sampling. The probabilistic sampling approach used by the Department provides an estimate of Statewide water quality conditions. A probabilistic assessment is conducted over a period of five years in rivers and streams for aquatic life uses. The results of the most recent probabilistic assessment were updated and included in the 2024 IWQR. For results of that assessment see the "Statewide Assessments using a Probabilistic Sampling Design" in Chapter 2 of the report. In addition, the Department has conducted modeling to provide a prediction of aquatic life conditions across the State. Although not used alone to assess aquatic life, the model results can provide another line of evidence to support stream data or provide information where stream data does not exist. See the 'Connecticut Macroinvertebrate Multimetric Index (MMI) Model' in Chapter 1 of the report for more information.

However, there is nothing better than data collected directly from waterbodies. The Department continues to support and expand several volunteer water monitoring programs as resources allow. For more information on our programs, please see our website: https://portal.ct.gov/deep/water/inland-water-monitoring/volunteer-water-monitoring-program. In addition, the Department was pleased to support two new water quality monitoring initiatives with partner organizations that contributed data during this cycle: The "Urban Waters Initiative" and the "LIS Pathogen Monitoring Network." The Department will continue to look for ways to support and expand water quality monitoring from partner organizations.

Water Quality Plans and Implementation Coordination

Comments 11&12:
Concerned about the bridge between Water Quality Plans (TMDLs, Protection Plans) and implementation. Recommends more support, education and technical assistance. Specifically Land Use Commissions at the Municipal Level.
Recommends strengthening local partnerships with watershed programs.

Response:
Thank you for your comments. The Department will add Land Use Commissioners and Land Trust Point of Contacts to our outreach lists in addition to sending information to the Municipal Leaders of CT. The Department also agrees that partnerships are critical to implementation. The Water Quality Program will work closely with the Watersheds Program to ensure better communication and partnerships to bridge the gap between Water Quality Action Plans and implementation.

Appendix A: Summary and List of Numbered Comments

Comment Number	Name/Organization (link to original comments)	Topic
1	Brendan Hayes New Canaan Resident	Domestic Fertilizers and Weed Killers
2-4	Carol Haskins, Pomperaug River Watershed Coalition	Listings/Delistings
5	Anonymous	CT Post Article
6-8	Paul Aresta, Council on Environmental Quality	PFOA / Monitoring
9-12	Alicea Charamut, CT Rivers Alliance	Monitoring /303 (d) Planning and outreach