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From: Sesto, Patricia <patricia.sesto@greenwichct.org>
Sent: Friday, April 05, 2019 2:38 PM
To: DEEP WQS
Subject: WQS comments

April 5, 2019

The Town of Greenwich would like to offer the following comments pertaining to the proposed changes to the Water Quality Standards.

1. We support the more protective of the two water quality criteria, be it the state's or EPA's.
2. We support the extended period of disinfection for sewage treatment plants north of I-95. However, we do not believe this requirement should be based on current use, as current use may be less than its potential if a different disinfection schedule was in place. Determination for extended disinfection should be based on the watercourse's potential use and an expectation that those uses will be pursued outside of the shorter disinfection period.
3. As proposed, we do not support defining highest attainable use based on observation of a particular study period. This appears to disregard what uses could be obtainable should the a number of variables change, such as restoration projects, pollution elimination/reduction, dam removal, etc. An adoption of highest attainable use as a regulatory consideration will become justification for doing less, rather than more to improve current conditions.
4. Similar concerns exist with downstream protection as a regulatory consideration. If a downstream reach has lower water quality, this should not be used to justify permitting detrimental practices upstream. Upstream uses should be held to a standard that reflects the potential restoration of downstream reaches. It should go without saying, that upstream uses should not be permitted if they are detrimental to downstream environments, regardless of distance.
5. We are supportive of groundwater designations that are consistent with the Aquifer Protection Areas. Further, in instances where a watercourse is within the cone of influence of an aquifer well, consideration of the upstream river classification should be made. A recent proposal by Aquarion to activate a well adjacent to the Norwalk River would have pulled as much as 30% of the river's flow into the adjacent aquifer. If that river is polluted, this would then impact the public drinking water supply.

We likewise support the SA designation or goal of an SA designation for shellfish bed areas. Quality shellfisheries are economically beneficial to both commercial fisherman and recreational users.

Thank you for your consideration.

Patricia Sesto, Director

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