



CONNECTICUT RIVER WATERSHED COUNCIL

The River Connects Us

deKoven House; 27 Washington Street; Middletown, CT 06457

Exhibit 15

May 20, 2013

Robert Hust
 Department of Energy and Environmental Protection
 Bureau of Water Protection and Land Reuse
 Planning & Standards Division
 79 Elm Street
 Hartford, Connecticut, 06106-512

RE: Comments on the 2013 Proposed Connecticut Water Quality Standards Regulations

Dear Mr. Hust,

Thank you for the opportunity to submit comments on the proposed Connecticut Water Quality Standards (WQS) Regulations. My name is Jacqueline Talbot, and I am the CT River Steward for the Connecticut River Watershed Council. Since 1952, we have been the principal citizen advocate for the entire 11,000 square mile watershed from its source to the sea. We work to conserve, protect and restore water quality and quantity, habitat and recreational access within the Connecticut River watershed. Our work informs our vision of both ecological and economic abundance. Plentiful, protected and restored water resources are one of the reasons people find this a beautiful and important state in which to live, play and work, and we are happy to be in the business of helping steward these assets of our state.

As the only advocacy organization created to act on behalf of the entire watershed, we want to work with diverse stakeholders to achieve strong water quality standards from source to sea. Through our One River Initiative we are taking a unified look at the River by erasing state boundaries and asking simple and hard questions about the entirety of our watershed. The most important of these questions is whether the water quality standards in each of our watershed's states are ambitious enough and consistent enough to ensure the Clean Water Act is being fully met. We are interested in working with stakeholders and state agencies in all states individually and collectively to achieve and implement strong standards that support diverse life in and around our rivers.

As the CT River Steward, I regularly comment on in-state planned development, permitted activities and standards affecting the health of the watershed. When evaluating individual permits within the watershed for public comment, one of the things I look for is their support of the WQS. We have appreciated DEEP's responsiveness to our comments and balanced approach in evaluating suggestions. I often make the same comments on individual permits, as there are certain observations that likely apply to waters throughout the state and that could be made to improve the Standards overall.

We fully support the codification of these standards, which have already undergone a formal public review process. We believe the Standards are important in the effort to protect water resources in the state and balance ecological and economic considerations. As the Water Quality Standard regulations evolve, we would like to see the following incorporated:

- 1. A disinfection period reflective of designated uses within the seasons of actual use**
The May 1-October 1st blanket timeline for disinfection north of Interstate 95 is not a protective window for all such rivers in the state, as some, like the Connecticut River, see significant usage in a wider timespan. We would like to work with CT DEEP and affected stakeholders on a disinfection season responsive to use, especially where UV disinfection has replaced chlorine disinfection and reduced negative impacts to aquatic life. Where possible, disinfection seasons should align with campground seasons. All sewage treatment plants should be required to have adequate backup power generation.
2. We applaud CT DEEP's progressive work to develop the Biological Condition Gradient so that we are living up to the Clean Water Act's charge of protecting the "physical, chemical *and* biological" integrity of our waters. This work gives us quality information about anthropogenic impacts to river life and allows us to make integrative decisions affecting water quality. Diverse life in rivers gives a sense of vitality and vibrancy of our community, and **we are eager to support CT DEEP in their further implementation and use of biological standards.**
3. We support progressive and effective nutrient management strategies that protect the biodiversity, recreational and economic potential of our water resources and the systems of which they are a part. Rather than just assigning numeric limits across the board, we would like to support an integrative approach and work with stakeholders on **nutrient criteria informed by biological response.** This is a great example of how important the work CT DEEP is doing on biological standards can be to comprehensively defining true water quality and appropriately mitigating impacts. We also would like to discuss a nuance added to the nutrient narrative about the regulation of nutrients which are limiting nutrients in the receiving water body.
4. We believe the upper temperature limits of 83 and 85 degrees Fahrenheit for salt and freshwater respectively, are too high in some cases to properly support diverse aquatic populations, especially cold-water fish species. We would like to work with CT DEEP Water Quality and Fisheries experts, anglers and other stakeholders to achieve **temperature standards that support diverse, indigenous aquatic life in our waters.**

We look forward to working with the CT DEEP and others in achieving strong standards that make sense for our state and are happy to discuss our comments at any time.

Thank you for your time and consideration.

Sincerely,



Jacqueline Talbot
Lower River Steward