



August 19, 2021

Re: Draft Statewide Lake Nutrient TMDL Core Document  
Draft Bantam Lake TMDL Appendix  
Draft Bantam Lake Watershed Based-Plan Addendum

Thank you for the opportunity to comment on these three documents. Rivers Alliance applauds the efforts of the dedicated stakeholders who have been working within this watershed for decades and who were instrumental in developing the Watershed Based-Plan. We are certain that this dedication will continue in the implementation of the recommendations in the WBP as well as the TMDL to protect and improve water quality throughout the watershed. We're happy to partner with local stakeholders in implementation.

Rivers Alliance has a few specific comments on the TMDL Core Document and the Bantam Lake TMDL.

### **Draft Statewide Lake Nutrient TMDL Core Document**

#### *Stormwater Utilities (p. 53)*

Public Act 21-115 An Act Concerning Climate Change Adaption should also be referenced in this section as it updated CGS 22a-498 and authorizes all municipalities, rather than just certain ones, to establish a municipal stormwater authority.

#### *Funding Sources – Rivers Alliance CT Watershed Assistance Small Grants Program (p. 68)*

This grant program was extremely beneficial to smaller, under-resourced watershed and conservation organizations that had small, impactful projects that were difficult to fund through other funding sources. Federal grant program applications can be extremely cumbersome for small organizations and piecing together funding from other sources can be challenging as well. And the majority of the time, these organizations can do so much with very little, offering a lot of “bang for the buck.”

Rivers Alliance has and will continued to apply for these funds from the 319 grant program and hope that, since this funding source continues to be listed in the core document, that DEEP may reconsider reinstating the program.

## Bantam Lake TDML

*Recommended Implementation Strategies - Amend local ordinances to better protect water resources and reduce future NPS pollution in stormwater runoff through such strategies as low impact development or green infrastructure. (p 41)*

The Bantam Lake watershed currently has relatively low development compared to other areas of our densely populated state. The majority of the decisions that will either protect or degrade water quality are made at the local land use commission level. There is a considerable amount of potential for development in this watershed and with this a potential to undermine implementation and investment in other strategies (some very costly as in the case of the Woodridge WWTF upgrades.)

The WBP highlights the value of reestablishing vegetated buffers as the lowest cost per pound of Phosphorus reduction. **Protecting buffers in the first place is essentially free.** Municipalities in the watershed should coordinate efforts and take advantage of this opportunity to ensure that land use decisions are evenly protective of wetlands and water courses throughout the watershed.

Thank you for including this as one of the first strategies on the list. River Alliance would be happy to offer assistance to municipalities in evaluating their local ordinances.

*Recommended Implementation Strategies - Identify areas in the watershed or ways to implement both structural and non-structural BMPs to control existing NPS pollution in stormwater runoff. (p 41)*

Please consider strengthening the emphasis of the following sentence: “Structural BMPs could include restoring and maintaining adequate shoreline buffers, especially for agricultural and developed lands adjacent to surface waters.” As was already mentioned, the WBP lays out the value of restoring buffers compared to other NPS reduction methods. Please consider the following sentence in its stead: “Restoration of shoreline buffers, especially for agricultural and developed lands adjacent to surface waters is one of the most cost effective BMP strategies and is strongly recommended.”

*Recommended Implementation Strategies - Address groundwater leachate pollutant sources from septic systems. (p 42)*

Thank you for including this as a strategy as the information that can be gathered from regular inspections and records will help to understand more fully the nutrient contribution from septic systems that have not been properly maintained. The WBP rates sources from septic systems as lower as a source of nutrient contribution because the assumption was made that all systems are well maintained. The contribution from this source may very well be higher. Identifying and addressing the problematic systems may bring significant progress toward meeting nutrient reduction goals.

Thank you again for the opportunity to comment.

Sincerely,



Alicea Charamut, Executive Director