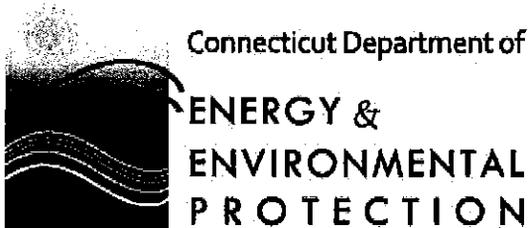


**STATE OF CONNECTICUT
INTEGRATED WATER QUALITY REPORT
2014
Appendix A: Public Comments**

July, 28, 2014-August 29, 2014



79 Elm Street
Hartford, CT 06106-5127
(860) 424- 3000
Robert J. Klee, Commissioner

Tokarz, Walter

From: Rebecca Martorelli <rebecca@qrwa.org>
Sent: Monday, July 28, 2014 1:46 PM
To: Tokarz, Walter
Subject: Draft 2014 WQR - question

Categories: Purple Category

Hello Mr. Tokarz,

I am on the Board of Directors for the Quinnipiac River Watershed Association and have downloaded the Draft 2014 Water Quality Report.

My question is this: Is there a link to a map that shows where the referred water body segment ID's are located? This would be helpful information for our members.

Thank you,
Rebecca Martorelli
QRWA

Tokarz, Walter

From: Joanna Shapiro
Sent: Wednesday, August 13, 2014 2:52 PM
To: Tokarz, Walter
Subject: Draft 2014 303d list

Categories: Purple Category

Hi Walter - I was just reviewing the draft 2014 Connecticut Impaired Waters List (EPA Category 5), and I was specifically looking at tributaries of the Scantic River. On page 79 of the 2014 State of Connecticut Integrated Water Quality Report, Buckhorn Brook (4205-00_01) is listed as Not Supporting its Recreation use. This seems to contradict what is shown within Table 3-4, however, because on page 241 of the report, Buckhorn Brook seems to be left off of the Impaired Waters List (EPA Category 5)...by my understanding, it should appear between Abbey Brook and Broad Brook, but I do not see it listed. Buckhorn Brook is listed on the 2012 Impaired Waters List, however. I believe that Buckhorn Brook may have been inadvertently left off of the 2014 Impaired Waters List, or perhaps there's been a change that I'm not aware of (although Buckhorn is still listed as "Not Supporting" its Recreation use on the draft 2014 305b list).

Thank you,
Joanna

Joanna Shapiro
Natural Resource Specialist
North Central Conservation District
(860) 875-3881
www.conservect.org/northcentral



CONNECTICUT RIVER WATERSHED COUNCIL

The River Connects Us

deKoven House; 27 Washington Street; Middletown, CT 06457

August 19, 2014

Walter Tokarz
Department of Environmental Protection
Bureau of Water Protection and Land Reuse, Planning and Standards Division
79 Elm Street, Hartford, CT, 06106-5127

Re: CRWC comments on the draft 2014 State of Connecticut Integrated Water Quality Report

Dear Mr. Tokarz,

On behalf of the Connecticut River Watershed Council (CRWC) I am submitting comments on the draft 2014 Integrated Water Quality Report (IWQR). Since 1952 CRWC has 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, and we enjoy stewarding resources that enhance the quality of life of watershed residents. In particular, we are looking forward to the day when the entire length of the Connecticut River and its tributaries will be fishable and swimmable.

We have great appreciation for the extensive monitoring, research, analysis and synthesis that goes into this report. Had we had more staff time available we would submit for comprehensive comments, but we wanted to highlight a few key points.

1. **Table 1-3, page 20: For Aquatic Life Use Support (ALUS) the Connecticut Department of Energy & Environmental Protection (CT DEEP) should separate out Tier 4 waters and create a separate category for “At Risk” that would serve as a gradual step between “Fully Supporting” and “Not Supporting.” These waters should be assigned management goals so they do not deteriorate into Tiers 5 or 6.** CRWC believes the Biological Condition Gradient is one of the most useful assessment tools CT DEEP has, yet we are not using it effectively when we allow a change as wide as Tiers 1-4 to be considered “Fully Supporting.” The gradient nature of this tool allows us to get past pass/ fail grades for our waters.
2. **Table 2-4, page 48: Waters assessed for ALUS should be labelled with their Tier number, not just the category of supporting or not.** Labeling a stream segment as Tier 3 as opposed to only “Fully Supporting” allows for a more nuanced understanding of that stream and its health. In order to truly protect high quality waters and improve threatened waters, we encourage DEEP to further integrate biological standards with the agency and public’s understanding of the quality and goals of our waters.
3. **Bacteria monitoring should align with the disinfection season in CTs Water Quality Standards (WQS).** Though the 2014 IWQR did not seem to indicate the monitoring season for bacteria, we are assuming it aligns with the current May 1-September 30 disinfection window in the WQS. If CT DEEP does expand the required disinfection period for bacteria, bacteria monitoring and ideally concurrent temperature monitoring should align with the extended season whenever possible.

HEADQUARTERS: (413) 772-2020
FAX: (413) 772-2090

UPPER VALLEY: (802) 869-2792
E-MAIL: crwc@ctriver.org

LOWER VALLEY: (860) 704-0057
WEB: www.ctriver.org

4. (Page 71) **We suggest that the DEEP consider breaking segment Connecticut River-03 up into two segments—one from the MA border to just north of Hartford, and then that point to Portland.** We have made this comment before. This assessment unit is an unusually long stretch at 35.26 miles (other related segments are usually no longer than 10.5 miles), and it seems too long to make sense for monitoring, assessment and sound decision making on the part of users when it comes to judging which recreational activities they can safely engage in.
5. **We invite CT DEEP to share results of staff members' beach monitoring and bacteria monitoring within the CT River Watershed on ctriver.us.** This collaborative website marries monitoring efforts within the entire watershed and offers river users recent bacteria data from 114 sites in all four states. In the past we have encouraged CT DEEP's efforts at a report card to more easily communicate water quality data to river users; as that effort has been put on hold for the time being, we would like to partner on strengthening this already well used tool. We would also like to work more closely with water quality staff on strategizing bacteria, temperature and biological monitoring within the CT River Watershed in CT.
6. **We agree that Connecticut River-02 should be prioritized for a TMDL for bacteria,** as the adjacent segments were in 2012; this will allow for more detailed potential source information and management strategies for that entire stretch above the estuarine region.

Thank you for your stewardship of CT's waters and the opportunity to comment on this draft.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline Talbot".

Jacqueline Talbot
River Steward

Tokarz, Walter

From: [REDACTED]
Sent: Wednesday, August 27, 2014 11:06 AM
To: Tokarz, Walter
Subject: My public comments on DRAFT 2014 CT Integrated Water Quality Report
Attachments: Before Timber Lake Development on Bantam Pond Weed Road Torrington, CT April 1991.jpg; After Timber Lake Development on Bantam Pond Weed Road, Torrington, CT Sept 2013.jpg

Categories: Purple Category

Greetings:

I would like to contribute my comments on a portion of the DRAFT 2014 Connecticut Integrated Water Quality Report. Specifically, I am referring to Bantam Pond (also called Timber Lake by developers), where Weed Road and Pumping Station Road meet in Torrington, Connecticut. The pond waters intersect with Waterbody Segement ID's CT6705-00_04 (Bantam River-04). So, this is a "far upstream" portion of the Bantam River.

My name is John Kulhowvick and I grew up in Torrington, CT. I still have family in the area, love to visit and have a great appreciation for the natural resources of the state.

I grew up in an area of Torrington that was very rural all through the 1980's and then experienced some rapid development (I know "rapid" is a relative term). Again, I am specifically referring to the "Weed Road" portion of Torrington where Weed Road runs close to Litchfield and Goshen. In the 1990's and beyond there was a great deal of residential building that I believe has adversely affected a pond through which the upper reaches of the Bantam river flows. I am very familiar with the many small streams that flow into this river and they are, quite beautiful.

I have two pictures of this pond (which borders Weed Road and Pumping Station Road). Google Earth images show the pond before development in 1991 and then the second image is from 2013. Even given the fact that the earlier picture from April, 1991 (was taken in the spring, when algae blooms may not be at their peak), I can attest, from living in this area during much of this time, that the September 2013 algae filled pond is a relatively recent development and, I think, shows that the septic systems (from the recent residential building (or other non-point nutrient sources) are having a detrimental affect on this watercourse. Ultimately, this water flows down the Bantam river and must be adversely affecting water quality all the way down the river (perhaps even affecting some of the Bantam Lake issues).

Additionally, I have determined that the State of Connecticut Department of Energy and Environmental Protection did an invasive plant species assessment on this pond in 2005. I have provided a link to the results: <http://www.ct.gov/caes/cwp/view.asp?a=2799&q=380174> This study did not (to my knowledge) refer to algae problems. This 2005 study was done prior to another wave on development on (until then), undeveloped portions of this area. To my "untrained eye", it seems that there are more factors affecting this pond than just invasive plants (as nasty as those can be).

I am hoping that these pictures and my personal knowledge may be able to generate some action on your part (or that of the state) to help reverse a very troubling issue regarding this water, or to minimize further degradation. This certainly can be used as a sign post for future development of ponds and lakes

in this part of the state. I used to swim in this pond and I can tell you emphatically that there were no such algae blooms in this pond before the development around it.

I hope this may help inform your water quality report. Thanks for taking the time to read my note. Please refer to the pictures I have included below.

Best wishes.

John Kulhowick

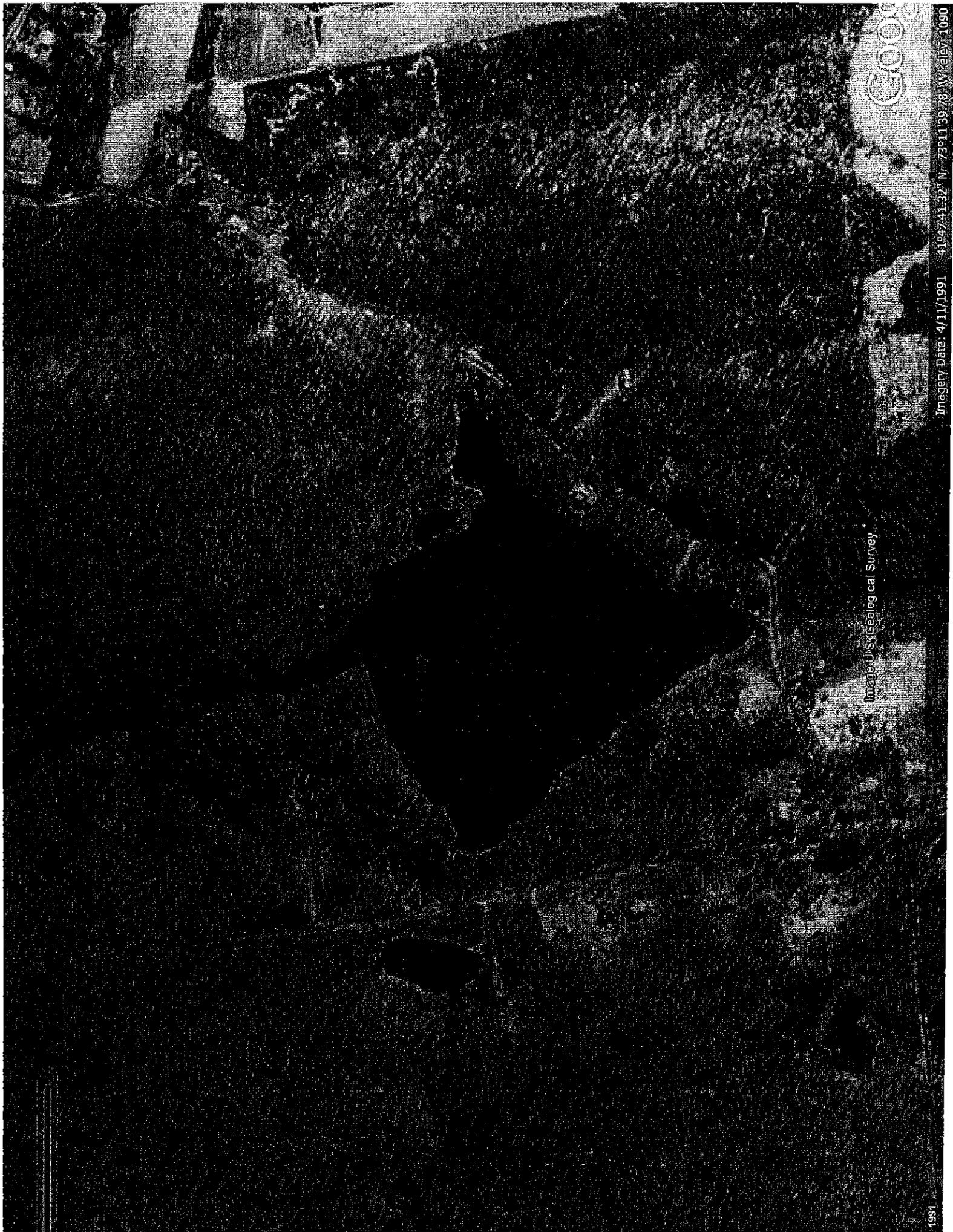
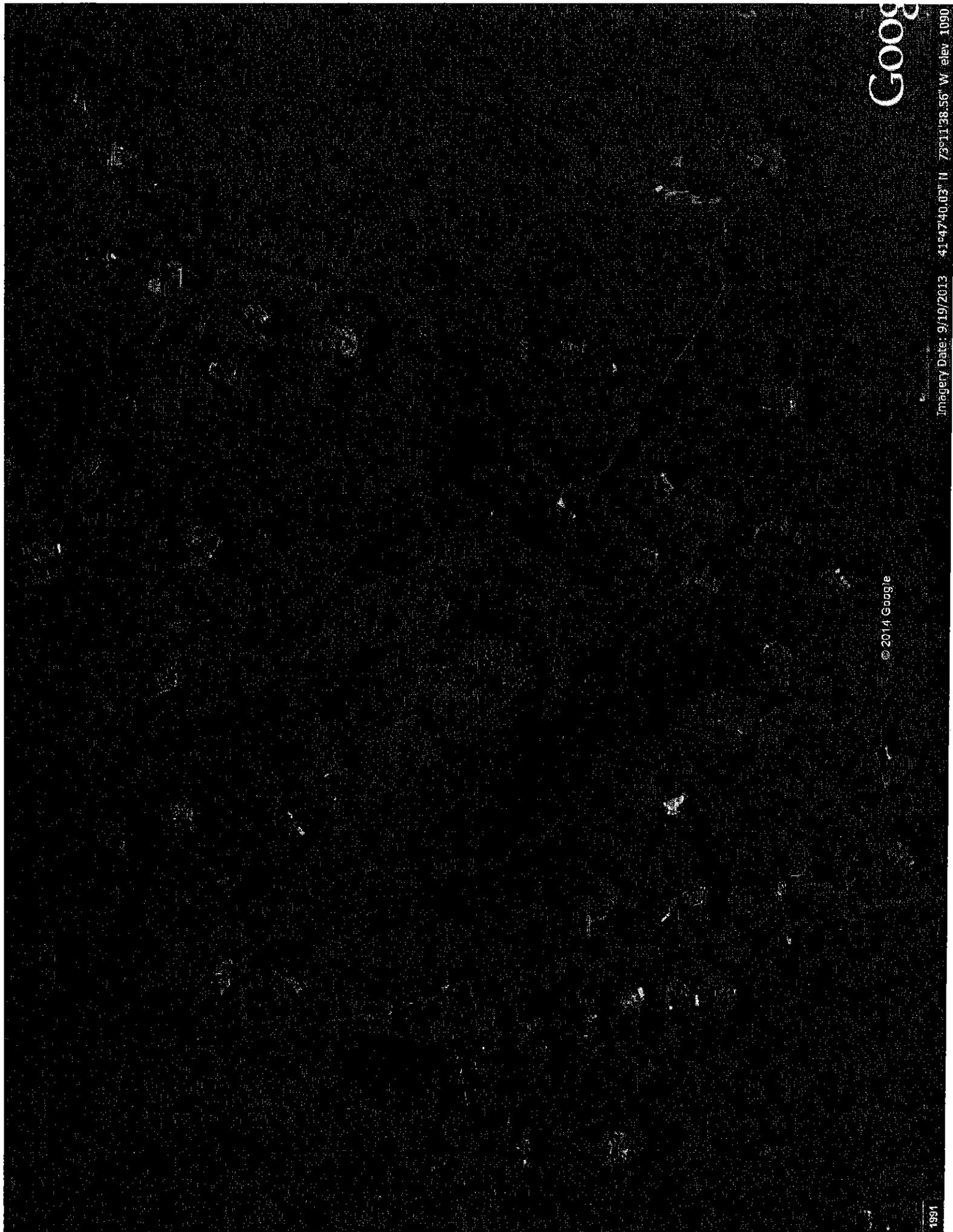


Image U.S. Geological Survey

Imagery Date: 4/11/1991 4184741.32 N 73113978 W Elev: 1090

1991

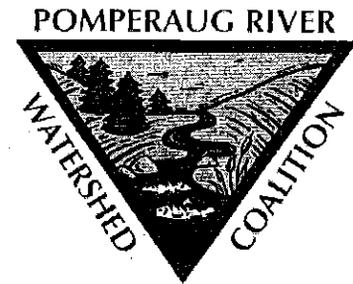


Google

© 2014 Google

Imagery Date: 9/19/2013 41°47'40.03" N 73°11'38.56" W elev 1090

1991



August 27, 2014

Mr. Walter Tokarz
Planning and Standards Division
Bureau of Water Protection and Land Reuse
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT, 06106-5127

Re: CRWC Comments on the Draft 2014 State of Connecticut Integrated Water Quality Report

Dear Mr. Tokarz,

On behalf of the Pomperaug River Watershed Coalition (PRWC) I am submitting comments on the draft 2014 Integrated Water Quality Report (IWQR). The Pomperaug Watershed is a 90 square-mile basin, which is a vibrant aquatic habitat that supports a healthy fish population; a key source for high quality drinking water; and a priceless source of scenic beauty. It includes three main rivers, the Pomperaug, Nonnewaug, and Weekepeemee, and the underground aquifer, as well as the land that encompasses these water resources. Since 1999 PRWC has been responding to increasing pressures that land development activities put on the local water supply. The vision of PRWC's founders was to ensure our region's supply of pure and plentiful water through three main activities: scientific research, education, and practical support through advocacy and advice. Our goals are to make sure that the people who depend upon our water understand the resource and that they take appropriate actions to preserve and protect it. As a convener of stakeholders, we work to ensure that everyone with interests in the region has the tools and resources they need to understand and care for this precious and fragile resource.

We have great appreciation for the extensive monitoring, research, analysis and synthesis that goes into this report. Focusing our attention on items related to the Pomperaug River Basin, we wanted to highlight the following key points:

1. Figure 1-1, page 11: **The highlighted river segment for Regional Basin 68 (Pomperaug River) in the Connecticut Rivers and Lake Basins Index does not reflect the main stem of the Pomperaug River.** The upper portion appears to highlight South Brook in Woodbury rather than the upper section of the Pomperaug.
2. Figure 2-2, page 32: We feel it would be helpful to the user to orient the map/figure show on this page to a landscape page layout. As a significant graphic showing the 305b Assessment Results, a larger version of the graphic will make it easier to view and interpret.
3. Figure 2-6, page 36: Same suggestion noted in item #2 above.
4. Table 2-4, pages 130-132: Included in the table are examples of river segments **where "not assessed" is indicated in regards to both Aquatic Life and Recreation.** With the status of "Not Assessed" it is **unclear why these segments are included in this "Assessments Results" table.** The three example segments that called this to our attention were: CT6800-10_01 Unnamed Tributary Pomperaug River Southbury; CT6802-00_03 Nonnewaug River-03; and CT6802-05_01 Harvey Brook-01 within the Pomperaug Regional basin (68).
5. Table 2-4, page 131: **The location description for segment CT6800-05_01 Bullet Hill Brook (Southbury)-01 should reflect "Old Field Road crossing" rather than "Cedarland (Old Field) Road crossing" as the correct place name.**

Pomperaug River Watershed Coalition, Inc.
39 Sherman Hill Road, Suite C-103, Woodbury, Connecticut 06798
Tel 203-263-0076 www.pomperaug.org info@pomperaug.org

6. Table 2-4, page 131: **The location description for segment CT6801-00_01 East Spring Brook (Woodbury/Bethlehem)-01 should reflect "Watertown Reservoir" rather than "Bethlehem Reservoir" as the correct place name.**
7. Table 2-4, page 131: **The location description for segment CT6801-10_01 Unnamed Tributary Pomperaug River Southbury should reflect "Platt Park" rather than "Plat Park" as the correct place name.**
8. Table 2-5, page 131: **Segment CT6800-05_01 Bullet Hill Brook (Southbury)-01 is noted as "Fully Supporting" for Aquatic Life. We feel that this designation for 3.56 miles of stream is inaccurate as it does not account for significant channelization of the stream as it spans from U.S. Route 6 (Main Street North, Southbury) near the entrance to the Southbury Plaza upstream along the backside of the shopping plaza. The stream is confined to a concrete channel as it spans the backside of the plaza as it flows between I-84 and Old Waterbury Road in Southbury. In order to reflect this flow regime alteration, we suggest DEEP consider breaking this segment into two or three segments.**
9. Table 2-5, page 165: **Though a river-focus organization, we acknowledge the status of Cat Swamp Pond (Woodbury) and Long Meadow Pond (Bethlehem/Morris) as indicated in the 305b Assessment Results as these are key headwater sources within the Pomperaug Regional Basin.**
10. Table 3-4, page 262 and Table 3-8, page 368: **We found there is a discrepancy for segments included in the Impaired Waters List. Segment CT6804-00_01 Weekepeemee River-01 is included on the Impaired Waters List (page 262), while Table 3-8 Reconciliation List of Impaired Waters (Delistings and Listings) on page 368 indicates that this segment should be delisted. The discrepancy is that the other two Pomperaug Basin segments included on page 368 (CT6800-00_01 and CT 6800-00_03) which indicate Delisting were not included in the Impaired Waters List. Based on this approach, it seems that CT6804-00_01 Weekepeemee River-01 should not be included on the impaired waters list.**
11. Table 3-5, pages 321-322: **We feel that it would be helpful to IWQR readers to include the Segment ID Number or at least the related segment designation in the "Waterbody Name" column of Table 3-5 to alleviate any confusion that may occur in reading this table.**
12. Table 3-7, page 347: **Two segments in the Pomperaug Regional Basin (CT6800-02_01 South Brook-01 and CT6800-03_01 Stiles Brook-01) are indicated as "Not Supporting" for Aquatic Life in Table 2-4 (page 131). They are also included in Table 3-7 Nonpollutant Impairments (EPA Category 4c). We are concerned that while they are included in this list of impairments there is a significant lack of guidance or prioritization related to the management measures required to meet the applicable water quality standards (as described this category is described on page 229). Separately, we feel that CT6800-02_01 South Brook-01 can be removed from this list as natural geologic conditions are the cause of this impairment. This segment was documented as "losing reach" of river by the United States Geological Survey in its 2007 investigation titled *Simulations of Ground-Water Flow and Residence Time near Woodbury, Connecticut*. A copy of this report is available online at: http://pubs.usgs.gov/sir/2007/5210/pdf/report_1-28-08_508.pdf with attention directed to page 25.**
13. Table 3-8, page 354: **We are pleased that CT6806-00_02 Transylvania Brook (Southbury)-02 has been recommended for delisting from the Impaired Waters List based on new bacteria data that meets the Water Quality Standards for recreation.**
14. Table 3-8, page 377: **We acknowledge that new bacteria data has revealed the need to list CT6806-00_01 Transylvania Brook (Southbury)-01 for Recreation as included in Table 3-8 Reconciliation List of Impaired Waters. Based on the discrepancies noted in item #5 (above), it seems that this segment should be included in Table 3-4 Impaired Waters List (Category 5) on page 262.**

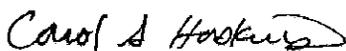
15. Table 3-9, page 391: **Acknowledging the listing CT6806-00_01 Transylvania Brook (Southbury)-01, we agree that it should be prioritized for a TMDL for bacteria.** This will allow for more detailed potential source information and management strategies.
16. Regardless of the discrepancies between Table 3-4 and Table 3-8, we feel that the stream segments that do not meet the designated water quality standards need to stay on the Impaired Waters List even when a TMDL has been approved. An approved TDML does not automatically improve the stream quality to a point where it is actively meeting the water quality standards. We feel that **a segment should only be delisted from the Impaired Waters List when it actually meets the water quality standard.** Until that time, we feel, it should remain on the impaired waters list. Removing it gives the misconception that the problem no longer exists.
17. Tables 3-7 and 3-8, pages 344-378: Note that there are some page formatting concerns with the placement of the page numbers.
18. General formatting suggestion: As a public document that most will access online, and potentially print sections pertinent to their watershed, it would be helpful to the user to match the page numbers in the PDF with those printed on the page so that when a user prints page 390, for example, they are entering page 390 in the print cue.

In addition to the comments above, we would also like to echo the following comments provided to you by Jacqueline Talbot of the Connecticut River Watershed Council:

1. Table 1-3, page 15: **For Aquatic Life Use Support (ALUS) the Connecticut Department of Energy & Environmental Protection (CT DEEP) should separate out Tier 4 waters and create a separate category for "At Risk" that would serve as a gradual step between "Fully Supporting" and "Not Supporting."** These waters should be assigned management goals so they do not deteriorate into Tiers 5 or 6. CRWC believes the Biological Condition Gradient is one of the most useful assessment tools CT DEEP has, yet we are not using it effectively when we allow a change as wide as Tiers 1-4 to be considered "Fully Supporting." The gradient nature of this tool allows us to get past pass/ fail grades for our waters.
2. Table 2-4, page 48: **Waters assessed for ALUS should be labeled with their Tier number, not just the category of supporting or not.** Labeling a stream segment as Tier 3 as opposed to only "Fully Supporting" allows for a more nuanced understanding of that stream and its health. In order to truly protect high quality waters and improve threatened waters, we encourage DEEP to further integrate biological standards with the agency and public's understanding of the quality and goals of our waters.
3. **Bacteria monitoring should align with the disinfection season in CT's Water Quality Standards (WQS).** Though the 2014 IWQR did not seem to indicate the monitoring season for bacteria, we are assuming it aligns with the current May 1-September 30 disinfection window in the WQS. If CT DEEP does expand the required disinfection period for bacteria, bacteria monitoring and ideally concurrent temperature monitoring should align with the extended season whenever possible.

Thank you for your assessment and stewardship of CT's waters and the opportunity to comment on this draft.

Sincerely,



Carol Haskins
Outreach Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

August 28, 2014

Mr. Walter Tokarz
CT Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

Via electronic mail

Dear Mr. Tokarz,

EPA New England appreciates the opportunity to provide comments on the draft *2014 State of Connecticut Integrated Water Quality Report*. I have reviewed the report and request that you consider the following comments and questions.

CT1001-00-1-L1_01 Wyassup Lake (North Stonington) and CT4308-00-1-L2_01 Compensating Reservoir (L. McDonough) (Barkhamsted/New Hartford): It is premature to delist these segments until they are officially included under the Northeast mercury TMDL. EPA recommends delisting these segments in the next listing cycle.

CT3200-00_01 Natchaug River: The reconciliation table shows this segment as being delisted for recreation/e. coli because new data shows it supports its recreational use. Natchaug River/Lauter Park Beach is shown in Table 3-5 (E. coli/recreation impairment) in category 2. Is this the same segment?

CT4316-00_02 Thompson Brook: Thompson Brook was covered under the 2012 Statewide Bacteria TMDL (e. coli/recreation impairment). The 2012 TMDL called for significant reductions in E. coli to meet water quality standards. The 305(b) table shows it as not assessed for recreation. The segment is also not listed in Table 3-5 as being in category 4a. Please correct the references to this segment.

CT4319-00_01a Salmon Brook, West Branch (Granby)-01a and CT4319-00_01b Salmon Brook, West Branch (Granby/Hartland)-01b: These segments were covered under the 2012 Statewide Bacteria TMDL, not the 2011 Salmon and Mountain Brooks TMDL as shown in the reconciliation table.

CT6806-00_02 Transylvania Brook (Southbury)-02: The geometric mean of 84/100 ml is still in excess of the water quality criteria for enterococci. Attainment of the enterococci criteria of 35/100 ml is necessary to delist this segment. This segment is not appropriate for delisting at this time.

CT6909-00-2-L1_01 Northfield (Reservoir) Brook Lake (Thompson): The comment field in the reconciliation table presents the segment as being listed, as opposed to delisted.

CT7105-01_01 West Branch Pequonnock River (Monroe)-01: The geometric mean of 146/100 ml is still in excess of the water quality criteria for E. coli. Attainment of the E. coli criteria of 126/100 ml is necessary to delist this segment. This segment is not appropriate for delisting at this time.

CT7109-02_01 Unnamed Tributary, Sasco Brook (Fairfield)-01: Please clarify if the 6 samples taken within the segment meet the water quality criteria for E. coli.

CT-C1_004-SB LIS CB Inner – Hayden Creek, Clinton: The 305b shows this segment as not assessed for shellfishing. The reconciliation table recommends delisting for fecal coliform/shellfishing impairment based on the segment having been listed without data. (Please note that this segment is listed twice in error in the reconciliation table.) However, this segment was part of the 2013 Addendum to the Statewide Bacteria TMDL (fecal coliform/shellfishing impairment). The TMDL called for significant percent reductions in fecal coliform to meet water quality criteria. In light of the existing TMDL, this segment is not appropriate for delisting for attainment of fecal coliform criteria at this time.

CT-W1_005 LIS WB Shore – Southport Harbor (Fairfield), CT-W2_006 LIS WB Shore – Southport Harbor (East), and CT-W2_007 LIS WB Shore – Southport Harbor (West): All three segments are showing as being in category 4a due to 2012 Statewide Bacteria TMDL (fecal coliform/shellfishing). Segment CT-W1_005 LIS WB Inner – Southport Harbor, Fairfield is listed in the reconciliation table because to the 2012 statewide TMDL. Is there a reason that segments CT-W2_006 and CT-W2_007 are not? The reconciliation table is used by EPA to accurately portray the state's progress in national reporting.

CT-W2_018 LIS WB Shore - Westcott Cove: This segment is listed in the 305(b) table as not supporting its shellfishing use and in Table 3-4 as being impaired for shellfishing due to fecal coliform. LIS WB Shore- Westcott Cove is showing in category 2 in Table 3-5. Is that an error? It should be presented in category 4a in the table as it was covered under the 2012 Statewide Bacteria TMDL and has not yet been delisted.

Page 230, first bullet: While public input may lead to a decision to delist a waterbody, public participation in and of itself is not sufficient reason for delisting.

Table 3-5: The table listing waterbodies with adopted TMDLs is the only table in the report that does not include waterbody segment ID numbers to distinguish multiple segments that have the same name. EPA recommends that segment numbers for the waters listed in Table 3-5 be included in the report in future listing cycles.

EPA New England appreciates your consideration and response to these comments. Upon receipt of the additional information requested I will confirm that there are no further questions regarding the waters being delisted in this reporting cycle. If you have any questions regarding these comments please contact me at 617-918-1322.

Sincerely,

/s/

Mary Garren
Water Quality Branch

cc:

Traci Iott, CTDEEP
Chris Bellucci, CTDEEP
Erik Bedan, CTDEEP
Ralph Abele, EPA
Diane Switzer, EPA

Tokarz, Walter

From:
Sent: Friday, August 29, 2014 12:44 PM
To: Tokarz, Walter
Cc: Frank Cochran; Malik, Christopher
Subject: Comments on drft Integrated WQ Rpt

Categories: Purple Category

Dear Mr. Tokarz:

On page 118 of the 2014 Draft CT Integrated Water Quality Report , I have a comment specifically regarding the river segment CT5305-00_01 description in Table 2-4, and generally regarding coastal river segments.

Waterbody Segment ID	Waterbody Name	Location	Miles	Aquatic Life	Recreation
CT5305-00_01	West River (New Haven/Woodbridge)-01	From head of tide (tide gates) at Chapel Street crossing (just DS of Edgewood Park Pond), New Haven, US to Konolds Pond outlet dam (just US of Bradley Road crossing), Woodbridge.	3.23	Not Supporting	Not Supporting

The reference to “tide gates” at the West River location is confusing since there are true tide gates further downstream at the Rt1/Orange Avenue crossing. There are no tide gates in the river at Chapel Street. I checked with Frank Cochran, a long time resident of the area, and member of the West River Watershed Coalition. His comment:

"There are no tide gates at the Chapel Street bridge over the West River. Before the tide gates at Route 1 were altered, Chapel Street had a small rapids which made passage upriver by kayak difficult or impossible and also, I believe, prevented any salt lens from making it any farther up the river. Perhaps someone observed the result and concluded that there was something man-made that caused it."

My specific recommendation for this report; change the location description for Waterbody Segment CT5305-00_01 to eliminate the reference to tides and tide gates. It should read: *“From Chapel Street crossing (just DS of Edgewood Park Pond), New Haven, US to Konolds Pond outlet dam (just US of Bradley Road crossing), Woodbridge.”*

An additional, more general point, river segments need to be adjusted to account for rising sea levels as saline water rises higher in the stream systems than it previously did. I know that is the case for the West River’s Duck Pond in New Haven’s Edgewood Park. Restoration took place a few years ago, but had to be replanted with more salt tolerant species as a combination of rising sea level and reconfiguration of the Route 1 tide gates allowed saline water further up the West River system. I would suspect that many of the coastal river segments in this report need to be adjusted to account for higher tidal influences.

Sincerely,

Martha Smith
3 Hine Place
New Haven, CT 06511
(203) 497-9698

Tokarz, Walter

From: [redacted]
Sent: Friday, August 29, 2014 4:16 PM
To: Tokarz, Walter
Subject: Comments on 2014 305b report

Categories: Purple Category

Dear Sir,

I have been the director of water-quality monitoring for CUSH (Clean Up Sound and Harbors) for the past seven years. I hope it's not too late to submit comments for the 2014 draft. If it is too late, then I hope they can be taken into consideration for the next report.

Comments:

1. Change of criteria for assessing exposure to low-oxygen conditions: The change in the acute criterion from <5 ppm to <3 ppm seems to me very significant, and it would be helpful to volunteer groups if it were flagged prominently in introductory material. This is straightforward, but the criteria for chronic hypoxia, though detailed, do not provide direct guidance on how intermittent samples should be scheduled and results interpreted.

- In our small coves, a number of consecutive biweekly DO samples may fall below 4.8 ppm. Given the caveat about how oxygen levels likely change between samples, can we conclude anything from these data? Specific recommendations for sampling frequency would be helpful not only to us, but possibly to DEEP as well.
- For smaller embayments, it would seem useful to collect DO data on both ebb and flood tides, as ebb and flood DO samples can vary widely (though sometimes they don't). Perhaps this would aid in deciding whether low-oxygen samples actually indicate excessive exposure to low-oxygen conditions. Scheduling sample collection on both tides before 8:00 am is challenging, but the results can be illuminating.

2. Pequotsepos Cove is not mentioned either in this draft or in the 2012 report. This is a small cove, less than a mile long, that emerges from Inner Mystic Harbor north of Mason's Island. The residents of this area are known to collect crabs and possibly shellfish in the cove, despite posting of signs in 2012 by the DA/BA. In 2013, dissolved oxygen remained at 3.3-4.4 ppm in four consecutive biweekly samples on both tides.

3. Mystic Inner Harbor (E1_008) is listed as fully supportive of aquatic life (p.185). However, in flood-tide Pequotsepos samples, which include a component from Fishers Island Sound as well as from north of Mason's Island, 2013 summer average dissolved oxygen was 4.3 ppm (range 3.8-5.9, N = 7). DO levels are consistently below those in ebb-tide samples from the mid-town Mystic River.

4. Wequetequock Cove (E1_003) is listed as having insufficient information to assess suitability for aquatic life. This cove has the worst water quality of any area we monitor, with high nutrient levels as well as low dissolved oxygen. In all monitored years (2009-2013), average summer dissolved oxygen in biweekly samples was consistently below 4.8 ppm, and in 2012-2013, 20% of ebb-tide samples were below 3.0 ppm. So far this summer, ebb-tide dissolved oxygen in July and August (4 samples) has averaged 2.4 ppm at the head of the cove near Rte 1, and 3.8 ppm further south, off Saltwater Farms Vineyard.

Thank you very much for providing the opportunity to comment on this draft, and I apologize for the delay.

Claire Gavin, CUSH

Tokarz, Walter

From: [redacted]
Sent: Saturday, August 30, 2014 1:17 PM
To: Tokarz, Walter
Cc: Wingfield, Betsey
Subject: Comments on IWQR

Categories: Purple Category

COMMENTS ON THE 2014 IWQR FOR THE CLEAN WATER ACT (CWA)
FROM RIVERS ALLIANCE OF CONNECTICUT

Rivers Alliance of Connecticut is the statewide non-profit organization that serves to protect all state waters. We were founded in 1992.

We support the comments submitted by the Connecticut River Watershed Council, the Pomperaug River Watershed Coalition, and consultant Martha Smith.

The statistic in the 2nd paragraph of the Introduction is confusing as a stand-alone number. Here's the text:

Water quality in Connecticut has improved over the last few decades as a result of protective laws, remediation efforts and a substantial investment in improved wastewater treatment. For example, the latest statewide assessment showed that 77% of the wadeable streams in Connecticut are healthy and meet aquatic life use support goals. Although difficult to compare with historic data, it is appropriate to point out that the percentage of streams meeting aquatic life goals during the late 1970's and early 1980's was much lower.

The 77 percent number seemed wrong (too high) until I realized that it refers only to one of the Clean Water Act standards. I recommend including the numbers for recreational uses and fish consumption. The fish consumption information given late in the report (page 27) does not seem consistent with medical reports and advisories for pregnant women.

It would also be helpful if DEEP would give the number based on the previous methodology, prior to GRTS use (page 15).

Thank you for the emphasis on the for stormwater clean-up and management. This is needed across the state.

Data Tiers (1 to 3). These data standards should include triggers for moving a water body onto or out of the impaired-water category. Tier 1 evidence is costly to collect. When there is adequate evidence other than that in Tier 1 to indicate a water body should be given a changed designation, then there should be incentives to do the appropriate Tier 1 studies. This is addressed to a degree later in the TMDL passages, but still much more could be done to alert the public and local commissions on where there are threats and opportunities.

Similarly, DEEP should revive the "threatened" water category. The purpose of the CWA is to maximize water quality consistent with designated uses. Special, transparent attention should be given to waters that are improving or in danger

of regressing. Speeding improvement and retarding regression should be encouraged so as to meet CWA goals. The data on added listings and delistings appear imbalanced and apparently inconsistent with reports from USGS and elsewhere. The IWQR showing many more delistings from the impaired-water list than new listings suggests that attention should be given more equally to candidates for both lists.

This paragraph (below) on flow impairments fudges the facts and strongly indicates that DEEP should do more to analyze and report flow problems.

DEEP documents streams and rivers affected by impoundments and water diversions as they come to our attention, however DEEP has not conducted a comprehensive assessment of flow impairments. Flow alteration has been reported as an impairing cause in stream segments with known water diversions and documented dry streams, primarily by field staff during sampling events and recorded by digital photos. For example, a number of stream miles, as in the lower Farmington River and the entire Quinebaug River, are affected by extreme fluctuations in water levels resulting from hydropower generation. DEEP staff have documented flow impairments on 1.4% of river miles, but 98.6% (2,333 river miles) are currently unassessed for flow. Similarly, a flow assessment was conducted for 1 of the 182 lakes tracked in this report. The extent of flow impairments is likely significantly under-represented in the assessment process.

On the same issue, the IWQR should include data used in the stream classifications developed pursuant to the flow regulation. If this cannot be done in the report, it should be added as an appendix and referenced in the body of the report wherever appropriate.

I do not understand the emphasis on wadeable streams (p. 45 ff) in the report and in DEEP's phosphorus negotiations. Probabilistic projects can be defined for reliability. But how is DEEP accounting for the state's important nonwadeable streams?

Thank you for the heightened attention to bacteria.

No river should be put into a category such as 4c in which no hope is offered. Why is channelization accepted as a permanent fate. Sometimes rivers are brought back to the sunshine. Sometimes dams are removed. Even if no action is contemplated in the immediate future, the nature if the problem and nature of a positive change should be described.