

79 Elm Street * Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

INTEGRATED WATER RESOURCE MANAGEMENT

SELECTED WATERS FOR ACTION PLAN DEVELOPMENT

RESPONSE TO PUBLIC COMMENTS

January 2017

Betsey Wingfield, Bureau Chief

Bureau of Water Protection and Land Reuse

Date

Table of Contents

Background	3
Public Engagement Process	3
Public Comments and Responses	5
Water Quality Planning Process	5
Collaboration	8
Pollution Sources	9
Funding Impacts	10
Watershed Specific Comments	10
Land Use and Development	12
Outreach and Communication	13
Lakes	14
Headwater streams and loading	15
Watershed data issues	15
Revised List of Waterbodies for Action Plan Development	16
Next Steps	21
Appendices	23
Appendix A Commenter Table	24
Appendix B Specific Watersheds	25
Annendix C Final Man of Selected Waters for Action Plan Development	35

Background

The State of Connecticut has taken a new approach to restoring and protecting water quality of Connecticut's rivers, streams, lakes and Long Island Sound. Using a new enhanced approach called Integrated Water Resource Management (IWRM), the Connecticut Department of Energy and Environmental Protection (CT DEEP) can better focus state resources and further collaborative efforts with local partners to restore and protect water quality. The IWRM approach is based on six key elements: Prioritization, Assessment, Protection, Alternatives, Engagement and Integration. More information on IWRM is available in a report entitled Integrated Water Resource Management in Connecticut and on the CT DEEP website http://www.ct.gov/deep/iwrm. The use of IWRM by CT DEEP includes longer term goal setting by selecting targeted waters for a six year time period through 2022. CT DEEP will also use IWRM to continue setting shorter timeframe goals in the Integrated Water Quality Report that sets goals for a two year time period.

As required by the Federal Clean Water Act, Connecticut creates water pollution reduction plans or water quality protection plans which can be thought of as a water pollution budget or diet for a waterbody. In the IWRM approach these budgets are a significant part of a water quality action plan. To support development of these action plans a list of targeted watersheds was developed by the Department using the IWRM process.

In May 2016, CT DEEP publicly announced a preliminary list of watersheds proposed for initial water quality efforts and development of action plans by CT DEEP from now until 2022. This list of watersheds is a key piece of meeting the requirements of the Clean Water Act. Each final selected watershed represents a commitment from CT DEEP to develop an action plan to either restore water quality or protect high quality resources in a watershed.

Public Engagement Process

The Federal Clean Water Act section 303(d) requires the States to report on the quality of waters within a State. This information is presented to US EPA and the public every two years by CT DEEP within the Integrated Water Quality Report. The priority target watersheds for developing action plans identified through IWRM is a significant input into that process. CT DEEP will continue to actively engage stakeholders and the public to comment on revisions to the IWRM list of selected waters for action plan development every two years through the Integrated Water Quality Report process.

As part of the public engagement component of IWRM, CT DEEP collected public comments from May 27, 2016 through June 30, 2016. During this time period the Department held two public information sessions that introduced IWRM and detailed the process and results of the preliminary watershed selections. Both information sessions were held on June 20, 2016. The first was in the morning at CT DEEP headquarters and the second session was in the evening at Goodwin College in their auditorium. Approximately 40 people attended the morning session at CT DEEP and an additional 15 people attended the evening session at Goodwin College.

This document summarizes comments received from 33 different commenters and 56 total comments and the CT DEEP responses to those comments. These comments are from a range of stakeholders including: watershed associations, concerned citizens, municipalities, and some industry groups. Many commenters were favorable about the new process and ability for CT DEEP to work on developing action plans for protection of high quality waters as part of the new IWRM approach. Several other comments were favorable in collaborating with CT DEEP to develop action plans and other implementation pieces in a watershed.

There were a few comments about the IWRM process and these centered on two areas. One topic was for additional watersheds to be included on the list that had not been on the preliminary list. The second was about the notification process and public comment opportunity. All comments have responses within this document.

Public Comments and Responses

This document summarizes comments that were received from the public. The public comments have been paraphrased and summarized to maintain the readability of this report, however, every effort has been made to preserve the original intent of the comment. When multiple commenters addressed similar issues, the comments have been merged and addressed with one response. References for each comment are included in parentheses after the comment text and a table identifying the commenter reference is included in Appendix A of this document. Public input was also provided through interactions during the information sessions, however no references to these comments are detailed in this document as the submitted written comments adequately represented questions and concerns with the IWRM process. During the informational meetings, CT DEEP staff encouraged the public to submit any formal comments in writing to the Department.

The remainder of this report follows a specific format. After each submitted comment, CT DEEP has drafted a response and included it immediately following the comment text. Several comments requested additional watersheds be added to the list of selected waters. These comments and responses are detailed in Appendix B which provides a list of additional watersheds requested for inclusion and includes information about selection process scores and ranks and also gives a conclusion for whether a suggested watershed is added to the final list of selected waters for action plan development.

Water Quality Planning Process

Comment 1. Will the IWRM selected waters listings be updated upon the release of the 2016 Integrated Water Quality Report? (12)

Response 1. The goal of IWRM is to establish an approach to managing water quality including the selection of waters for action plan development consistent with the environmental goals for the state, addressing critical water quality concerns and public input. The planning horizon within the IWRM process extends to 2022 consistent with EPA recommendations, providing a longer planning horizon to allow for the ability to address water quality issues which may need a longer time period to develop the appropriate action plans and collaborate with stakeholders. However, the waters selected through the IWRM process also informs the selection of waters for action plan development within the next two years, as identified within the 2016 and subsequent Integrated Water Quality Reports. The list of selected waters for action plan development identified in the Integrated Water Quality Report starts with the broad list of waters from the IWRM report, and then takes into account additional practical considerations such as the water quality concerns within the watershed, the availability of data and ability to obtain additional data if needed, staff or other resources, and regulatory and volunteer partnerships within the watershed. The 2016 Integrated Water Quality Report, which will be released for public comment in January 2017, includes recommended waters selected from the IWRM list of waterbodies, and identified a subset of these waters for development of action plans from January 2017 through September 2018.

Comment 2. The end date of the project (2022) is too far away and there are no intermediate progress checkpoints to track progress and accountability of project work. (6, 12, 19, 21, 24)

Response 2. The 2022 time period was established by EPA as a target date for completing action plan development in the EPA memo "A Long-Term Vision for Assessment, Restoration, and Protection under the Clean Water Act Section 303(d) Program"

(https://www.epa.gov/sites/production/files/2015-

<u>07/documents/vision 303d program dec 2013.pdf</u>) While the 2022 date provides a general time frame for action plan development, CT DEEP expects that some plans may be targeted for completion prior to 2022. The availability of data, complexity of water quality conditions and impacts, and strength of partnerships factor into the timeframe within which CT DEEP can develop action plans. Waterbodies for which plans will be developed within the near term will be selected from the overall list of waterbodies from this IWRM process and subsequently identified every two years as part of the Integrated Water Quality Report. There are additional public comment opportunities for waterbodies identified for plan development as part of the Integrated Water Quality Report will identify the action plans that are expected to be developed within the next two years.

Comment 3. Two years is not enough time to organize partners and funding for a project. Mobilization in a watershed may occur due to a priority listing and then have the watershed removed from the list before implementation projects are completed within the watershed. (21)

Response 3. The IWRM selection process doesn't cap project work at any timeframe within a watershed. The only goal is for CT DEEP to develop action plan documents for each of the selected waters by 2022. While the waterbody list can be revisited and adjusted every 2 years, this will not affect project work that is underway to enhance water quality in any selected watersheds.

Comment 4. The IWRM process deals with developing more plans at a time when resources are limited, CT DEEP should allocate more funds and resources towards implementation not more planning efforts. (12)

Response 4. CT DEEP agrees that restoration and protection of water quality relies on successful implementation actions. One of the reasons that CT DEEP embarked on the IWRM process is to improve water quality planning and development of action plans in a manner to better support successful implementation activities. IWRM focuses on CT DEEP developing action plans for selected waters in Connecticut where there is high likelihood of successful implementation projects. These plans are expected to facilitate implementation efforts that will enhance water quality.

Comment 5. Concerned that DEEP is not balancing efforts effectively between planning and implementation actions. This balance is even more critical when considering the limited resources of the State. (26)

Response 5. CT DEEP encourages implementation efforts to continue with partners in watersheds across Connecticut. The IWRM process requires action plan development by CT DEEP for submittal to EPA. These action plans will help detail sources of pollution to assist with implementation that will most directly address water quality issues. In some of the selected watersheds, the action plans can detail previously unknown sources and better direct implementation efforts.

Comment 6. The new efforts of working to protect healthy waters and not just restore impaired waters is a cost effective and beneficial approach. (7, 16, 18, 21, 26, 28)

Response 6. CT DEEP is also excited to develop action plans for protecting high quality waters. EPA is giving States a chance to develop these protection action plans for the first time. CT DEEP will be looking for partners in the selected protection watersheds to help localize information and focus the plans on the most important resources and actions to protect existing high water quality.

Comment 7. CT DEEP should protect source water areas through the acquisition of critical land. (7)

Response 7. CT DEEP Water Planning staff have been coordinating with CT DEEP Land Management staff throughout the IWRM process. Information on critical lands has been considered in developing the selected waters list and land acquisition will be evaluated further as a possible implementation approach to affect water quality in the appropriate watershed.

Comment 8. CT DEEP should consider re-screening the watersheds using an increased weighting for water protection for drinking water sources in the screening scenarios. (3, 16, 27)

Response 8. A number of drinking water resource factors such as reservoirs, aquifers and related water quality and quantity classifications were considered at equal weights with many other important selected indicators in the ecological and social categories. This approach was used since there are a number of existing special drinking water protection programs and approaches in place in Connecticut. CT DEEP supports the continued protection of these resources but the Department also needs to focus on resource areas that may not have enough protection to prevent degradation of aquatic use and recreational resources. There are at least 8 selected watersheds that have drinking water watersheds and aquifers within them. CT DEEP may adjust weights for screening runs during future revisions to the list of selected waters.

Comment 9. Will groups be able to see the raw data used in the screening tool as indicators for the evaluated scenarios and watersheds? (21, 22, 29, 30)

Response 9. CT DEEP must consider these requests on a case by case basis. There are some datasets that contain sensitive information, so sharing those files will not be possible at this time. However, some of the data used by CT DEEP is available to the public from EPA in on online version of the Recovery Potential Tool.

Comment 10. CT DEEP should consider bringing back the threatened category for IWQR assessments. (12)

Response 10. There is currently no formal EPA threatened category, however CT DEEP may consider such an informal designation in the future.

Collaboration

Comment 11. Our organization is willing to partner and collaborate with CTDEEP to develop plans and accomplish the goals of the IWRM approach. (5, 7, 8, 10, 16, 20, 21, 22, 26, 28, 31)

Response 11. To successfully address water quality issues in a waterbody, local partnerships are an essential piece of action plan development and implementation support and activity. The ardent support evidenced in these comments for working collaboratively with CT DEEP and the selected watersheds is indicative of the continued strong efforts we have come to reply upon from Connecticut watershed associations and groups.

Comment 12. Will there be additional meetings and opportunities to discuss IWRM with CT DEEP as it moves forward with selections and action plan development? (23, 24, 32, 33)

Response 12. CT DEEP is committed to addressing water quality issues in the final waterbodies that are selected for IWRM focus. Additional meetings with potential partners will be essential for CT DEEP to develop successful action plans that will set the template for implementing tangible water quality improvements. In addition to public comment opportunities provided though the Integrated Water Quality Report and waterbodies for near term action plan development. Project specific opportunities may also be available during the development of each watershed specific action plan.

Comment 13. Does weighting partnership opportunities in a watershed have a negative impact for areas that need restoration or protection of water quality but have no active partners? (19)

Response 13. The presence of partners was viewed as a positive characteristic for a watershed due the goal of improving water quality in selected watersheds. CT DEEP will be relying on local collaborations for both information to develop the action plans but also for resources and efforts for implementation to address issues that are reviewed in the plans. These collaborations will rely on active partners for successful enhancement of water quality in a watershed.

Pollution Sources

Comment 14. CT DEEP should consider using thermal pollution as an indicator of impairment or lack thereof as an indicator for high quality waters. (12, 19, 26, 30)

Response 14. The potential for thermal impacts on water quality was considered during the selection process. Water Monitoring staff work closely with Fisheries staff to conduct annual temperature monitoring in streams across Connecticut. The use of small deployed temperature recorders has given the Department a vast amount of thermal data on streams. As part of this selection process subsets of data were extracted, sorted and filtered for values that were above maximum temperature values in the surface water criteria. There was not a significant amount of data points above the Water Quality criteria within the dataset that was evaluated by DEEP staff. Temperature data may be considered in the future as part of a specific watershed action plan development process.

Comment 15. Areas not covered by the MS4 permit program may not have the regulatory requirements or mechanisms to enhance water quality. (22)

Response 15. The enhanced MS4 permit is one programmatic tool for obtaining improved water quality in urban watersheds. Watershed areas not included in the new MS4 permit may need to rely on other programs and tools to facilitate implementation of TMDLs developed in these watersheds.

Comment 16. CT DEEP should consider adding *Vibrio* species monitoring to current bacteria efforts as these species are pathogenic and can negatively impact the shellfish industry. (23)

Response 16. There have been 325 reported cases of Vibrio infection of humans from 1996-2015 in Connecticut. CT DPH does conduct sampling of laboratories as part of the Food Net surveillance program according to Quyen Phan of the Epidemiology and Emerging Infections Program at DPH. The Bureau of Aquaculture has also conducted vibrio monitoring and collection of environmental observations to correlate higher risk of illness with specific on the ground conditions. Recently the Bureau of Aquaculture implemented more stringent requirements for shellfish harvest and storage. These efforts and other more stringent controls seemed to be effective in Connecticut with reduced illness from shellfish as the result. CT DEEP does not currently plan to conduct additional vibrio monitoring based on the positive impacts of the Bureau of Aquaculture efforts.

Comment 17. CT DEEP should consider leaf litter as a source of organic matter in estuaries that can cause ammonia spikes and fuel sulfate reducing bacteria in these estuaries. (23)

Response 17. CT DEEP will consider this nutrient source and its ramifications as action plans are developed for affected watersheds. The enhanced MS4 permit also does include some leaf litter management provisions.

Comment 18. CT DEEP should consider dam removals, protecting tidal marshes with regard to ecological value and resiliency and flood protection values. CT DEEP should also review permitting for implementation of resiliency projects to support these values. (24)

Response 18. CT DEEP will be considering these pieces and others as action plans and implementation recommendations are developed for selected waterbodies.

Comment 19. CT DEEP should consider adding a category of "revitalization" in addition to the protection and restoration categories in the screening approach. A focus on green infrastructure and resiliency would be part of this new category. (25)

Response 19. This concept can be addressed through action plan development, state programs and other local implementation efforts. A focus on green infrastructure and resiliency can be utilized in appropriate watersheds and situations. Coordination with the Connecticut Institute for Resilience and Climate Adaptation (<u>CIRCA</u>) for implementation recommendations is one example of a way to approach these needs within the existing restoration or protection categories and outside of the IWRM process.

Funding Impacts

Comment 20. Will CTDEEP alter funding opportunities for watersheds across Connecticut based on selection or exclusion to the selected waters priority IWRM list? (12, 19, 22, 25, 29)

Response 20. CT DEEP may consider selected watersheds for priority funding or other water quality programs depending on the availability of funding sources.

Watershed Specific Comments

Comment 21. Many watersheds were suggested as additions to the selected waters list via public comment. CT DEEP was requested to add the following watersheds: North Branch of the Park River, East Branch of Eightmile, Pequabuck River, Roaring Brook – Farmington, Nelson Brook, Fenton River, Mill River, Salmon Creek, Mudge Pond Brook, Outlet Webatuck Creek, Candlewood Lake, Headwaters and Outlet of Shepaug River, Bantam River, East Aspetuck River, Pootatuck River, Silvermine River, Mill River Frontal LIS/ Sasco Brook, Rooster River Frontal LIS, Mianus River, Byram River, Pequonnock River, Rippowam River/ Stamford Harbor, and Oyster River/Cove River Frontal LIS.

Response 21. All watersheds were considered as part of the screening process used by CT DEEP to generate the list of selected watersheds. A detailed table featuring each of the watersheds requested to be added to the IWRM selected waters list is attached to this Response document as Appendix B. While we are not able to accommodate a substantial expansion of the list of

selected waters for action plan development at this time, we are proposing to add a few of these recommended waters to the list.

Comment 22. Many watersheds also received support for their inclusion on the initial selected waters list. This list included the Norwalk River (5), Farm River (7), Quinnipiac (7), West River (7), Saugatuck River (8), Sasco Brook (8), Scantic (22), and each of the listed estuary segments (24).

Response 22. Thank you for supporting the inclusion of these waterbodies.

Comment 23. CT DEEP should consider a rotation timetable to ensure all watersheds are included in the action plan development process. (25)

Response 23. While all watersheds were evaluated during this IWRM process, action plans are not necessary for every watershed. State regulatory programs and non-regulatory actions may be sufficient in some areas, this is especially true for watersheds where there are already known efforts and implementations occurring in a watershed. The selected waters for action plan development list will be reassessed periodically in the future to potentially add to or revise the selected waters, in response to new information and available resources.

Comment 24. CT DEEP needs to consider the potential negative impacts on a watershed experiencing further degradation due to lack of resources and not being included on the selected waters priority list. (22)

Response 24. The IWRM process is being used to select watersheds to focus on CT DEEP developing action plans. Other state regulatory programs and non-regulatory actions will still take place in watersheds even if not selected through this process. This is especially true for watersheds where there are already known efforts and on-going implementation projects or regulatory actions.

Comment 25. CT DEEP should consider the impacts of not listing a watershed. There are concerns that currently active projects will not be completed if a watershed does not appear on the selected waters list. (25)

Response 25. See responses #23 and #24.

Comment 26. CT DEEP should review the Blackledge River scores in the watershed screening ranks. A TMDL document may not have been included while considering the rankings for priority selections. (29)

Response 26. The Blackledge River TMDL was actually drafted for Gay City State Park Pond and the included recreation area. This pond and the river are segmented as separate waterbodies by CT DEEP and the bathing beach area in the pond is not considered representative of the river

for assessment purposes. The existence of the TMDL for the pond would have been captured in the scoring and ranking process used to develop the priority list of selected waterbodies.

Comment 27. CT DEEP should review files to see if Ed Bills Dam removal on the East Branch of the Eightmile River is included in the records used to score and rank watersheds in RPS Tool. (30)

Response 27. The records used for sorting and scoring the watersheds included the number of dams in the watershed with and without fishways. The existence of Ed Bills Dam in these files will be reviewed, however, it is unlikely that one less dam is enough to significantly alter the final cumulative scores for watershed, but the potential impact of this change will be evaluated by CT DEEP staff.

Comment 28. There is concern over including Comstock Brook as a priority for bacteria impairment and not including Steep Brook as a bacteria priority. (33)

Response 28. Comstock Brook is impaired for bacteria impacts on the waterway. The study work completed and associated implementation action have likely improved the water quality. But either a TMDL must still be completed as an action plan for the waterway, or additional monitoring efforts must show that there is no longer an impairment on Comstock Brook due to bacteria for de-listing the stream from the CT impaired waters list. Steep Brook can be evaluated as part of the efforts for the Norwalk River HUC12 watershed. As will a review of any additional Comstock Brook information.

Comment 29. Transylvania Brook is still listed as impaired, did the removal of the source of impairment not improve the water quality in the stream? (2)

Response 29. CT DEEP anticipates improvements in water quality at this location due to the elimination of the failing septic system discharge. Additional monitoring is needed to confirm that the elimination of this pollution source to the waters of Transylvania Brook has resulted in an improvement in water quality.

Comment 30. The Farm River is susceptible to nutrient loading from agricultural and residential land use in the watershed. This loading can add to nuisance algae and cyanobacteria problems downstream of the drinking water reservoir. (7)

Response 30. Nutrient loading reduction strategies will be a focus in the selected watersheds as the IWRM process moves forward with action plan development in the Farm River and other waterbodies. Actions to address nutrients will have an impact on cyanobacteria issues. CT DEEP is also evaluating the creation of other methods and actions to address cyanobacteria.

Land Use and Development

Comment 31. Successful economic development in Windsor undoubtedly has had an impact on water quality due to prolonged peak flows. (1)

Response 31. The enhanced MS4 permit includes requirements for managing stormwater to reduce impacts on Connecticut surface waterbodies. Additional monitoring and source identification efforts will direct implementation recommendations to more effective locations for improving the quality of waters affected by stormwater discharges.

Comment 32. CT DEEP should consider the sum of value of resources from a watershed, including economic drivers that can be lost without adequate restoration efforts due in part to not being selected for the priority waters list. (20)

Response 32. Considering economic value and potential economic losses due to declines in water quality is beyond the current evaluation process used by CT DEEP. These factors could be utilized in the further review of watersheds especially as action plans are developed to address water quality issues in a watershed.

Comment 33. We have concern about the water quality impacts on local waterways from the UCONN expansion and additional wastewater system pressures. (11, 14, 17)

Response 33. UCONN activities are subject to state water quality permitting and other related state regulatory authority. Also as a state entity UCONN is required to comply with the requirements of the Connecticut Environmental Policy Act. Many of these projects will include public comment opportunities.

Comment 34. The State must have more government enforcement such as consent orders and regulations that can empower local communities to enhance water quality. (6, 13, 18)

Response 34. CT DEEP continues to use a broad range of regulatory, permitting, assistance and enforcement tools to maximize protection of public health and the environment, maintain a strong, credible enforcement presence and to minimize potential impacts that regulated activities can have on the environment. The enforcement and/or compliance tools the Department employs include inspections, data tracking and monitoring, compliance assistance, and administrative enforcement. The website below provides an overview of the tools available to the DEEP and the policies associated with Department enforcement activities.

http://www.ct.gov/deep/cwp/view.asp?a=2694&q=322602&deepNav_GID=1629

Outreach and Communication

Comment 35. CT DEEP needs to increase and enhance outreach efforts to improve engagement with the IWRM process and water quality issues overall. (4)

Response 35. CT DEEP agrees. We are expanding our use of social media and conventional communication to municipalities, business and industry groups, and watershed and other

environmental groups. Several public presentations have been given by staff to interested parties on the IWRM process and project. Additional opportunities to share the project goals are welcome and additional efforts will be taken in selected waterbodies as efforts to gather information and develop action plans move forward through the project. CT DEEP also created a water quality website and Story Board of the IWRM process at (www.ct.gov/deep/iwrm).

Lakes

Comment 36. Both Bantam Lake and Lake Waramaug have been experiencing a decrease in fishing quality and are increasing in green water conditions. (15)

Comment 37. Beach closures due to blue-green algae on Candlewood Lake in recent years may not be accounted for in the IWRM screening process. Several closures have occurred in the current calendar year 2016 and these impacts are not reflected in the Impaired Waters List. (20)

Responses 36 & 37. Lakes are an important resource within our state and the Department has several key initiatives to support achieving good water quality in lakes. In the Water Quality Standards, changes were made to the section on lake tropic status to recognize that nutrient enrichment in lakes, as seen through the extent of aquatic plant coverage in lakes, needed to be considered when evaluating the trophic status of lakes. This translates into efforts within the CT DEEP Monitoring and Assessment program which evaluates water quality in lakes as part of the EPA US National Aquatic Resources Surveys that includes an assessment of lakes on a probabilistic basis within each state once every 5 years. On an annual basis, the Monitoring and Assessment program conducts targeted lake monitoring at 10 lakes or reservoirs every year which will result in a minimum of 50 lakes sampled for every 5 year period.

Clearly nutrients have a large impact on lakes, which results in a focus on evaluating lake trophic status to determine if lakes are becoming anthropogenically enriched. Related to that condition is also a concern about the development of Harmful Algal Blooms within our lakes which can pose a threat to public health, recreation and our pets and wildlife. CTDEEP in conjunction with the CT Department of Public Health and the Connecticut Association of Directors of Health have developed guidance for local health departments to help with the evaluation and management of Harmful Algal Blooms in order to protect public health.

The need to address the impact of nutrients on lakes was also identified as a specific recommendation coming from the Coordinating Committee and three Workgroups convened to address the Phosphorus Reduction Strategy for Inland Non-Tidal Waters established through Public Act 12-155. The forthcoming report from that process, Recommendations for Phosphorus Strategy Pursuant to Public Ac 12-155, and the Report to the Coordinating Committee from the Nonpoint Source Workgroup (available on the CT DEEP Phosphorus Strategy webpage http://www.ct.gov/deep/cwp/view.asp?a=2719&q=474130&deepNav_GID=1654%20) identify

the need to address internal phosphorus loadings within lakes and ponds as part of a sound nutrient control strategy

CT DEEP, though the IWRM process has identified nutrients, stormwater and recreational uses as areas of focus for the development of action plan, all of which can affect water quality in lakes. The screening conducted as part of IWRM using the Recovery Potential Tool was done at a larger geographic scale, so individual lakes and ponds were not specifically evaluated as part of that process. However, recognizing that challenge, the interest from the public regarding the health of lakes in Connecticut, the results of the efforts under Public Act 12-155 and the critical need to respond to the new information on Harmful Algal Blooms in Connecticut obtained through the use of the joint guidance provided on this issue, CTDEEP is proposing to add Bantam Lake and its contributing watershed to the list of waterbodies for action plan development. The intent is to develop an innovative approach to evaluate nutrient loadings to the lake and the potential for development of Harmful Algal Blooms. The action plan proposed for Bantam Lake would serve as a prototype for conducting similar studies at other lakes in the state. CT DEEP is seeking support from EPA for the development of this project.

Headwater streams and loading

Comment 38. The focus of restoration efforts must be in the headwaters to reduce pollutant loading to downstream sections of a watershed. (18)

Response 38. CT DEEP did consider the value of headwater streams as part of the evaluation process for selecting waters for action plan development. As action plans are developed an enhanced indicator focusing on stream order is being considered as part of the ranking process for local basins within a larger watershed to target implementation efforts based on the developed action plans.

Watershed data issues

Comment 39. Can CT DEEP provide examples of watersheds that illustrate a relatively simple action plan document and work load versus a watershed with significant data collection needs. (19)

Response 39. In very broad and general terms, a more simple watershed action plan would include waterbodies that are small and have a limited watershed area and have few known impairments, data to detail the sources of impairments, and active local partners either in the form of non-governmental organizations, or municipal government. A waterbody with significant needs would be one with a large watershed area, with no assessed waterbodies, many unknown sources of contaminants, very old monitoring data or none at all, and no active partners able to assist with generating more recent and comprehensive data.

Revised List of Waterbodies for Action Plan Development

In response to the screening and ranking process and the information generated by public outreach and participation, CT DEEP has generated the final list of selected waters for action plan development. The list reflects changes based on the public comments and responses included above in this report.

Table 1. Watersheds that received comments during public outreach efforts

Watershed Name	Request for Add	Support for Inclusion
Byram River	X	
Mianus River	X	
Rooster River-LIS	X	
Mill River Frontal LIS	X	
Silvermine River	X	
Pootatuck River	X	
Shepaug River	X	
Bantam River	X	
East Aspetuck River	X	
Candlewood Lake	X	
Webatuck Creek	X	
Mudge Pond Brook	X	
Mill River	X	
Fenton River	X	
Nelson Brook	X	
Roaring Brook – Farmington	X	
Pequabuck River	X	
East Branch Eight Mile River	X	
North Branch Park River	X	
Pequonnock River	X	
Rippowam River / Stamford Harbor	X	
Oyster River Frontal and estuary	X	
Norwalk River and estuary		X
Farm River		X
Quinnipiac River		X
Saugatuck River and estuary		X
Sasco Brook		X
Scantic River		X
West River		X
Mystic River and estuary		X
Niantic River and estuary		X

Preliminary waterbodies for action plan development were previously identified focusing on restoring or protecting healthy waters for fish and wildlife, coastal embayments, supporting swimming and shellfishing activities, as well as addressing impacts from nutrients and

stormwater. After considering comments received and taking a refined took at resources and waterbody selection, CT DEEP is making some changes to the list of waterbodies identified for action plan development but not changing the broad focus areas which support these selections.

Swimming & Shellfishing

CT DEEP has revised the list of waters, identifying 53 portions of freshwater rivers and lakes and 16 coastal areas for the development of action plans to address impacts of elevated levels of bacteria on recreation and shellfishing activities. This represents an increase in number of waters for action plan development from the public notice draft. CT DEEP has included 10 additional portions of freshwater rivers and 2 coastal areas for plan development based on new information indicating elevated levels of bacteria in these waterbodies.

Action plans developed for these waters will be TMDLs to address elevated levels of bacteria and will address all potential sources of bacteria, including stormwater. These TMDLs will be added to the Connecticut Statewide Bacteria TMDL.

Coastal Embayments

Development of action plans were proposed for 8 coastal embayment complexes and connected upland watersheds: Pawcatuck River, Stonington Harbor, Mystic Harbor, Niantic River Estuary, Farm River, Southport Harbor and Sasco Brook, Saugatuck River Estuary and Norwalk Harbor. CT DEEP has not changed this list of selected embayments but has refined the upland watershed areas to include in the action plans.

The initial watershed boundaries used to identify contributing upland watersheds were evaluated on a more refined scale to make sure that only upland areas that are hydrologically connected to the embayments are identified for inclusion in the plan. Upland areas that do not have any watershed connections to the embayments will not be included in the action plans. In the Southport Harbor and Sasco Brook Embayment, this has resulted in additional upland watershed areas being identified, correcting an omission in the draft provided for public comment, and in other areas there has been some reduction in the upland watershed area. CT DEEP has evaluated these refined upland watershed areas in comparison to the separate previous study conducted by Dr. Jamie Vaudrey of UCONN (see this draft report; Comparative Analysis and Model Development for Determining the Susceptibility to Eutrophication of Long Island Sound Embayments, http://seagrant.sunysb.edu/projects/t/comparative-analysis-and-modeldevelopment-for-determining-the-susceptibility-to-eutrophication-of-long-island-soundembayments?q=) in support of the EPA nitrogen strategy to make sure that upland areas included in that study were not omitted in the CTDEEP refined proposal for upland watersheds. Our evaluation indicates that the upland watershed areas currently identified by CT DEEP cover mostly similar areas as those used to support the preliminary EPA Nitrogen Strategy work.

In general, action plans for these areas will address nutrients, although additional pollutants may be included in the plan depending upon water quality needs and data availability. All sources which could potentially contribute nutrients will be evaluated, including the contributions from stormwater.

Healthy Water for Healthy Fish and Wildlife

Action Plans for Water Quality Restoration

As part of the public notice, CT DEEP identified 10 watersheds for potential development of action plans focused on water quality restoration. Several of these watersheds have been removed from the list of waters for action plan development. In some cases, the waters have been removed because an action plan is not needed. In other cases, waters have been removed after considering the resource constraints which may prevent development of action plans by 2022. In the future, additional waterbodies may be considered for action plan development as other plans are completed and resources are available.

Table 2. Updated details for the list of freshwater Restoration Action Plan Selected Waters

	Retain for Action	toration Action Plan Selected Waters
Watershed	Plan	Discussion
	Development	
Headwaters Still		These watersheds have TMDLs established for
River		bacteria as well as copper, zinc and chlorine. The
		focus of the anticipated action plan will be to
		conduct an updated evaluation of stressors,
		including nutrients and metals, which may be
Limekiln brook/Still	Yes	preventing attainment of aquatic life water quality
River		goals. Separately, a local watershed group is
Kivei		developing a watershed based plan to implement
		actions in support of bacteria TMDLs in the
		watersheds. Assistance will be provided to
		support this effort as needed.
Weekeepeemee		These adjacent watersheds are impaired for
River		recreational uses due to elevated levels of bacteria
Nonewaug River		and do not generally exhibit impairments to
		aquatic life uses. As TMDLs have been
		established to address the recreational use
	No	impairment and are not needed for other reasons,
	140	these watershed have been removed from the list
Pomperaug River		for action plan development. A local watershed
		group is developing a watershed based plan to
		implement actions in support of the bacteria
		TMDLs in these watersheds. Assistance will be
		provided to support this effort as needed.
		In 2012 TMDLs to address recreational
		impairments due to elevated levels of bacteria
West River	No	were established for areas within the West River
VV OST ICIVOI	INU	watershed. This was followed up in 2015 with
		the development of a watershed based plan for
		the West River watershed which focused on

Watershed	Retain for Action Plan Development	Discussion
		implementing the bacteria TMDLs and providing recommendations to address other water quality concerns within the watershed. Given the existence of water quality implementation plans within the watershed, development of an additional action plan for this watershed is not needed at this time.
Headwaters Quinnipiac River		These watersheds have been retained for the development of nutrient focused action plans.
Outlet Quinnipiac River	Yes	Other pollutants may also be included dependent upon water quality analysis and availability of data. All sources contributing to water quality impairment within the watershed will be evaluated, including stormwater.
Mill Brook – Farmington River	Yes – but reduced in scope	The action plan for this watershed will be reduced in scope to focus on two smaller watersheds associated with Bradley International Airport. A TMDL for those watersheds needs to be updated with new information. The TMDL focuses on deicing agents. The revised action plan may be expanded to consider other additional pollutants.
Lower Scantic River	Yes	These watersheds have been retained for the development of nutrient focused action plans. Other pollutants may also be included dependent upon water quality analysis and availability of data. All sources contributing to water quality impairment within the watershed will be evaluated, including stormwater.
Bantam Lake Watershed	New	CT DEEP has applied for funding from EPA to develop an action plan dealing with cyanobacteria issues in Bantam Lake. The review will include the direct rivers connecting to the lake and completion of the plan.

Action Plans for Water Quality Protection

Eight watersheds were previously identified as candidates for action plans that are focused on water quality protection. Development of water quality protection focused action plans is new in Connecticut. CT DEEP decided that a subset of the proposed watersheds should be selected as demonstration projects for development of protection based action plans. This will allow for the development of an appropriate approach to such plans, while not overcommitting limited State resources to a process which has yet to be fully defined by CT DEEP and EPA. Additionally, in

several of these watersheds, there is currently limited water quality data and uncertainty regarding the potential to obtain sufficient additional data in time to develop plans by 2022.

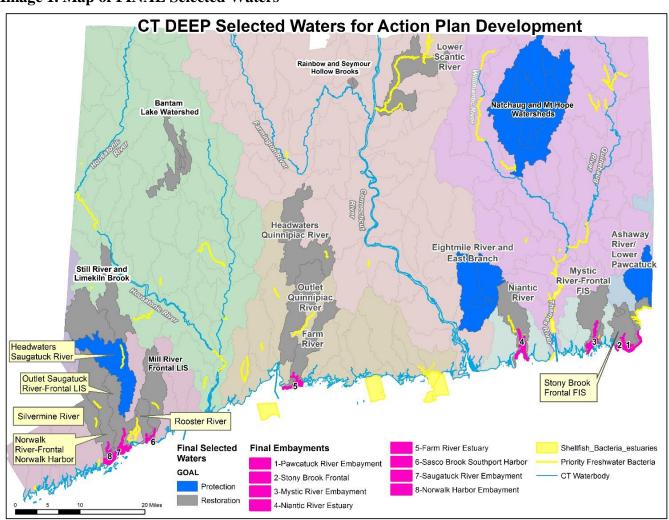
Four of the preliminary eight watersheds were retained for protection plan development. Two of these watersheds (Headwaters Saugatuck River and Ashaway River) are also associated with coastal embayments for which action plans will be developed by CT DEEP. The remaining two watersheds, Eightmile River and the Natchaug/Mt Hope River watersheds, will serve as demonstration projects for development of protection based action plans. The areas associated with both of these watersheds have been expanded from what was identified during the public comment period. The watershed area for protection action plan development within the Eightmile River watershed has been expanded to include an additional watershed, the East Branch of the Eight Mile River. This is in response to requests during the public comment period and to ensure consistency with the existing Eight Mile River Watershed Wild and Scenic Plan. The area associated with the Natchaug and Mt Hope River watersheds was significantly expanded to include the Bungee Brook, Still River, Bigelow Brook and Stonehouse Brook as tributaries to the Natchaug and Squaw Hollow Brook as a tributary to the Mount Hope watershed and the addition of the Fenton River watershed. CT DEEP has received funding from section 319 of the Clean Water Act to assist with the development of a protection plan under the Healthy Waters program at EPA which would encompass the expanded Natchaug River and Mt Hope River watershed areas. As there is strong watershed group support for actions within both the expanded Eightmile and expanded Natchaug and Mount Hope watersheds and funding to support efforts specifically in the expanded Mount Hope watershed, these areas were selected as demonstration projects for the development of protection plans. In the future, additional waterbodies may be considered for water quality protection focused action plan development as other plans are completed and resources are available.

Table 3. Updated details for the list of freshwater Protection Action Plan Selected Waters

Watershed	Retain for Action Plan Development	Discussion
Headwaters Saugatuck River	Yes	Also contributes to Saugatuck River Estuary Embayment
Carse Brook – Housatonic River	No	Consider for future protection plan development
Lower West Branch Farmington River	No	Consider for future protection plan development
Roaring Brook	No	Consider for future protection plan development
Eightmile River	Yes	To be used as a demonstration project for the
East Branch of the Eight Mile River	New	development of water quality protection plans.
Mount Hope River	Yes	
Sawmill Brook –	Yes, Partially, with	To be used as a demonstration project for the
Natchaug River	no inclusion of	development of water quality protection plans.
	Sawmill Brook	
Bungee Brook	New	

Watershed	Retain for Action Plan Development	Discussion
Still River (Basin	New	Note: The Sawmill Brook – Natchaug River
3202)		Area includes the Natchaug, Still River, Bigelow
Bigelow Brook	New	Brook, Stonehouse Brook and Bungee Brook
Fenton River	New	watersheds. Mt Hope includes Squaw Hollow
		Brook.
Ashaway River	Yes	Also contributes to Pawcatuck River Estuary

Image 1. Map of FINAL Selected Waters



Next Steps

Completing the prioritization piece of the IWRM process has generated the List of Selected Waters for Action Plan Development. The project does not end at this point. CT DEEP will work to generate action plans for each of the selected waters. These documents will entail

summaries of water quality issues and will assist with creating solutions. CT DEEP will be continually coming back to the public for feedback and input on the process and individual action plans. Below are some of the key pieces that CT DEEP will conduct to continue the IWRM process.

- Submit Final Initial Selected Waters for Action Plan Development List to US EPA
- Coordinate the Selected Waters for Action Plan Development List with the Integrated Water Quality Report
- Develop data collection plans and review existing water quality related data in selected waters and determine data collection needs
- Coordinate with US EPA to determine connection with estuary efforts and application to CT DEEP selected waters list estuaries
- CT DEEP conducts outreach to potential partner groups in selected waters
- CT DEEP begins working on action plan development for the selected waters in this document

Appendices

Appendix A Commenter Table. Commenter letters received for IWRM 2016 DRAFT list.

Group or Commenter	# within Response
	Document
Eric Barz, Windsor Town Planner	1
DeLoris Curtis, Land Use Administrator, Southbury	2
Rod Christie, Exec Director, Mianus River Gorge	3
Peter Cooper, Concerned Citizen	4
Louise Washer, Norwalk River Watershed Assoc	5
Nancy Alderman, Community Foundation of Greater New Haven	6
John Hudak, Environmental Planning Manager, Regional Water	7
Authority	
Alicia Mozian, Conservation Director, Westport	8
Scott Randall, Concerned Citizen, Sherman	9
Carl J Amento, Exec Director, SCRCOG	10
Alison Hilding, Concerned Citizen, Mansfield	11
Margaret Miner, Exec Director, Rivers Alliance	12
Lynne Bonnett, Concerned Citizen, New Haven	13
Quentin Kessel, Concerned Citizen, Mansfield	14
Ron, email comment	15
Eric McPhee for Lori J Mathieu, Public Health Chief, CT DPH	16
Linda Painter, Director of Planning & Development, Mansfield	17
Scott Sharlow, Vice President, Friends of Bennetts Pond	18
Shelley Green, Director of Conservation Programs, TNC	19
Larry Marsicano, Exec Director, Candlewood Lake Authority	20
Eileen Fielding, Exec Director, Farmington River Watershed Assoc	21
Alicia Charamut, Lower River Steward, CT River Watershed Council	22
Tim Visel, Concerned Citizen, New Haven	23
Sandy Breslin, Co-Chair, LIS CAC	24
Mary Pelletier, Founding Director, Park Watershed	25
Martin Mador and Mary Mushinsky, River Advocates of South Central CT	26
Elizabeth Garra, Exec Director, CT Water Works Assoc	27
Michael Jastremski, Watershed Conservation Director, Hous Valley Assoc	28
Pat Young, Watershed Coordinator, Salmon River Watershed	29
Partnership	
Pat Young, Program Director, Eightmile River Watershed	30
Brian T Roach, Chairman, Source Water Protection Committee, CT AWWA	31
Tracy Brown, NE Restoration Coordinator, Trout Unlimited	32
,,	33

Appendix B Specific Watersheds. This table includes details for each of the HUC12 watersheds that were given additional consideration by CT DEEP for inclusion in the IWRM selected waters list based on received public comment. Each of these watersheds was suggested as an addition to the list by at least one of the received public comments. The table includes some details about the watershed screening conditions and the response for the current list. The screening conditions center on the evaluation of indicators and scenarios that CT DEEP utilized in the Recovery Potential Screening (RPS) tool and any further review of resources in a watershed. All of these watersheds will be reconsidered by CT DEEP during future reassessments for inclusion on revised selected waters lists.

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
010802050302	North Branch Park River	 Many large scale projects such as the MDC CSO control efforts and multiple Clean Water Act 319 funded projects occurring in watershed Do not want the Park River to be thought of as a throw-away watershed 	 As projects are completed in the watershed, remaining water quality issues will be determined by reassessing on the ground situations. This new information will determine the need for and targets of, any future action plans. The watershed already has a bacteria TMDL document and watershed based plan CT DEEP has determined that stormwater is a large contributor to water quality issues and the new MS4 permit and related implementation may also address some issues in the watershed. There is also benefit to giving time for the process to occur and then reevaluate water quality planning needs. 	25	• Not at this time
010802050902	East Branch Eightmile River	Wild and scenic studies and certification covers	This watershed will be combined in action plan	30	• Yes

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
		both Eightmile and the East Branch • Protection planning document should cover both Eightmile and the East Branch	reports with the Eightmile River Combined with Eightmile these will be the demonstration project for protection plans Has a watershed management plan		
010802070404	Pequabuck River	Upcoming watershed based plan under development	 Watershed characteristics did not result in advancement during RPS screening process CT DEEP could assist with development of 319 Watershed based plan via local basin mapping A bacteria action plan already exists in the watershed 	21	Not at this time
010802070405	Roaring Brook- Farmington River	 Request to add the entire Farmington Watershed The watershed is linked to recent wild and scenic designations for both upper and lower Farmington May be able to leverage funding based on new designations 	 There are a limited number of impaired waterways in the watershed for restoration planning Various waterbodies have bacteria TMDL 	1	• Not at this time
011000020108	Nelson Brook- Willimantic River	Request to add to protect tributaries to Willimantic (Eagleville Brook, Nelson Brook, Cedar Swamp Brook)	MS4 Permit compliance and requirements should assist the town with developing in a manner to maintain quality of these resources	11 and 14	Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
			 Eagleville already has IC TMDL to assist with development planning Eagleville Brook has watershed based plan Eagleville, Willimantic, and Cedar Swamp Brook have bacteria TMDL 		
011000020204	Fenton River	Requested to further protection of the Natchaug River and surrounding area of Mansfield	 This watershed will be included as part of the protection planning efforts that connect Mount Hope and other tributaries to the Natchaug River There is a bacteria TMDL for Bicentennial Pond 	11 and 14	• Yes as part of MT Hope protection planning
011000040301	Mill River	 Request to add geographically close to West river and Quinnipiac Easier for implementation if all towns in area are targeted. Protect resources for anglers and other recreation, especially the area of East Rock Park 	 There are multiple remediation projects underway in the watershed as well as a bacteria action plan. Will reassess water quality issues as implementations are completed in the watershed There is a Mill River Impervious Cover Response Plan 	10 and 26	• Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
011000050305	Salmon Creek	 Add due to local investments in habitat restoration and fish monitoring and water temp efforts in conjunction with DEEP. Restoration potential is high due to strong local buy in 	 The watershed did not advance to any top 40 list during RPS screening process CT DEEP could develop local basin rankings to share with Trout Unlimited staff for restoration efforts. 	32	Not at this time
011000050502	Mudge Pond Brook	 HVA wants to work on headwaters of Tenmile in NY, consider for protection list Have NY funding for Tenmile and getting CT towns involved in process and updates on funding and projects Starting a Ten Mile River roundtable group 	 The watershed did not score within any top 40 list in RPS screening process CT DEEP can assist with planning efforts via GIS mapping 	28	• Not at this time
011000050503	Outlet Webatuck Creek	See Mudge Pond brook		28	Not at this time
011000050601	Candlewood Lake	 Candlewood Lake is an major economic driver for the region, fishing tournaments, boat ramps, and NDDB areas Increase in cyanobacteria blooms closing beaches 	 Did not score in top 40 watersheds for RPS rankings except for nutrient protection Nutrients in lakes have been identified as a concern to address though the Coordinating Committee, Workgroups and finals reports 	9 and 20	Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
		 Not currently on the impaired waters list Multiple municipalities adjacent to lake borders makes for difficult coordination and implementation 	pursuant to Public Act 12-155. CTDEEP is planning to develop an Action Plan for Bantam Lake to address nutrients and Harmful Algal Blooms. This plan is intended to serve as a prototype for developing similar plans for other lakes. Candlewood Lake would be considered for development of a similar Action Plan in the future. CT DEEP could develop local basin rankings to share with Candlewood Lake staff for prioritizing of restoration efforts.		
011000050701	Headwaters Shepaug River	 HVA considering moving programs to the basin in next 2 years Including on the selected waters list can invigorate some less active watershed groups HVA will be working to enhance watershed scores for next round of rankings 	 The watershed can be revisited for future revisions to the selected waters list The watershed did meet screening cutoffs of top 40 (restoration) and top 20 (protection) for stormwater Could be a protection plan in the future, focus on nutrients and general watershed health. There is a Walker Brook bacteria TMDL in the watershed 	28	Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
011000050702	Bantam River	 Part of Shepaug request from HVA Also comment about bad bass fishing and greener lake than in previous years 	 Did score well in RPS rankings Bacteria TMDL exists Nutrients would be target of any action plan for Bantam River. Consistent with the recommendations of the Coordinating Committee, Nonpoint Source Phosphorus Workgroup and associated reports developed in response to Public Act 12-155, CT DEEP is working to address nutrient loadings and impacts to lakes, ponds and impoundments through a proposed demonstration project at Bantam Lake. Any plan developed for Bantam Lake could inform plan development at other lakes, or implementation in the larger Bantam Lake watershed, including the Bantam River. 	29	• Yes, Bantam Lake area
011000050602	East Aspetuck River	Lake Waramaug public comment to get on request list	 The watershed did not score in top 40 in any scenario during the RPS screening process No active groups for potential partnerships 	29	• Not at this time
011000050703	Outlet Shepaug River	See headwaters Shepaug River		28	Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
011000051001	Pootatuck River	 Part of HVA request, also submitted 319 proposal for funds for a watershed based plan for Pootatuck Groups involved: HVA, Candlewood Valley TU, Pootatuck Watershed Assoc, Newtown Forest Assoc "tipping point" for water quality due to increasing impervious cover percentages 	RPS ranking only top 40 general health protection, not for other scenarios	28	Not at this time
011000060201	Silvermine River	 Tributary of the Norwalk and is in a densely populated area. Known bacteria issues in submittal letter from Norwalk river initiative Request to do this instead of Comstock Brook Bacteria TMDL Landuse is primarily low density residential 	 Silvermine did score in top 40 for RPS restoration ranks Bacteria and nutrients as likely targets for action plan. Bacteria TMDLs will be completed where data is available and will be expanded as new data is collected 	33	• Yes
011000060302	Mill River- Frontal Long Island Sound	Request to add due to proximity and upland watershed to Sasco Brook/Southport Harbor	Connected to embayment identified for action plan development	8 and 24	• Yes

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
		 Connected to priority embayment Sasco brook Municipal efforts have been active collecting data, unsure if mostly bacteria or additional information 	 Focus on Nutrients and Bacteria implementation assistance Probable Action plan for nutrients as a target There are bacteria TMDLs for Mill River, Rooster River, and Sasco Brook 		
011000060303	Rooster River- Frontal Long Island Sound	 See Mill River Frontal LIS Connected to Western Southport Harbor Includes Sasco Brook 	 Is connected to Priority Estuary Has an existing Watershed based plan Also has bacteria TMDL 	8	• Yes
011000060402	Mianus River	 Request to add from Mianus River Group Drinking water supply and diadromous fish run need to be protected 	 Scored well in RPS tool and made top 40 rankings Has a watershed based plan Does have MMI stations and is connected to an embayment (non –priority selection) Good potential for implementation efforts CT DEEP can develop local basin maps to assist local group efforts The watershed can be reevaluated when a larger commitment to the embayment and contributing watershed can be made 	3	• Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
			 Can also utilize generic IC response plan documents 		
011000060403	Byram River	Request from CAC LIS for inclusion with connected estuary	 Did not make any of CT DEEP RPS screening cutoffs for water quality scenarios Has a watershed based plan Has a bacteria TMDL Further consideration of this estuary and upland watershed will be re-evaluated when a larger commitment to embayment and contributing watershed can be made 	24	• Not at this time
011000060401	Rippowam River	Stamford Harbor request by CAC LIS with this watershed as upland piece	 This watershed did not advance during the RPS screening process due to low ecological scores in each scenario Consideration of the watershed will be re-evaluated when a larger commitment to embayments and contributing watersheds can be made 	24	Not at this time
011000060301	Pequonnock River Frontal	Pequonnock River Estuary request from CAC LIS	 This watershed did not advance through RPS screening due to low ecological scores Consideration of the watershed will be re-evaluated when a larger commitment to 	24	Not at this time

Watershed ID	Watershed Name	Public Comment	CT DEEP Response	Commenter	Add to Selected Waters List
			embayments and contributing watersheds can be made Has a watershed based plan		
011000040304	Cove River Frontal LIS	Oyster River estuary request from CAC LIS	 Very low RPS screening scores for results in each scenario Consideration of the watershed will be re-evaluated when a larger commitment to embayments and contributing watersheds can be made Can also utilize generic IC response plan documents 	24	• Not at this time

Appendix C. Final Map of Selected Waters for Action Plan Development

