



P.O. Box 271646
West Hartford, Connecticut 06127

5 April 2019

Traci Iott
Water Quality Program
Supervising Environmental Analyst
Connecticut Department of Energy & Environmental Protection
DEEP.WQS@ct.gov

Re: Triennial Review of The Connecticut Water Quality Standards and Classifications

Public Comments from:

Mary Rickel Pelletier
80 Elizabeth Street, Hartford, CT 06105
Founding Director Park Watershed, a 501c3 urban-suburban watershed stewardship organization
+ *Member of MDC Clean Water Project Citizens Advisory Committee (09/2004 thru 12/2014)*

Dear Ms. Iott,

Park Watershed is a 501c3 organization for citizen stewardship in the urban-suburban Park River regional watershed. The Park River regional watershed stretches east of the Metacomet Ridge to the Connecticut River. Brooks in West Hartford, Hartford, Bloomfield (68%), northern neighborhoods of New Britain, Newington and the eastern third of Farmington flow into either the North or South Branches, which converge as the Park River. Park River tributaries flow through neighborhoods, scenic city park landscapes, backyard gardens, nature trails, recreational paths, and woodlands throughout the 78 square mile watershed, which hosts a population of over 270,000 citizens.

The formation of Park Watershed as a 501c3 was based on an “Action Item” recommendation listed in the North Branch Park River Watershed Management Plan, which was approved by US EPA in July of 2010. Thus, a primary focus of our work and collaboration with others has been on the North Branch Park River. We are concerned that water quality in the North Branch continues to degrade, due to on-going development upstream in the Towns of Bloomfield and West Hartford. We are also concerned that in the 2018 Update to Long Term Control Plan (LTCP), the MDC requested an extension of the schedule.

With respect to the MDC LTCP issues, there is a concern that MDC or others will request lowering the classification of the North Branch Park River – so as to avoid investments required to improve water quality. Given that many property owners own to the middle of the North Branch, can the Water Quality Standards and Classifications **be updated to require that all property owners must be notified of any proposed changes to the classification – not simply through notification published in a local newspaper, but also through a distinct letter mailed to the property address?**

Are there any notification improvements in [Human Health Criteria Updates](#) for property owners along the North Branch Park River when sewage-laden flood waters disperse waste upon their lawns?

Park Watershed agrees with the recommendation that fresh water low flow ought to be changed to correspond with annual Q99 flow as to increase availability of flow data through US Geological Survey Stream Stats. Please note that low stream flow in the North Branch Park River – and other urban-suburban tributaries in the Park River regional watershed – is integral to water quality problems. Increased emphasis on groundwater recharge would be appreciated.

Note that the classification of surface waters east of the North Branch between Albany and Farmington Avenues as GB is not entirely consistent with the site conditions, especially south of Albany Avenue to Woodland Drive



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where a woodland forest surrounds the stream corridor. The North Branch Park River Watershed Management Plan found that water quality actually improved slightly within this area. **Can there be a more detailed assessment of this site on the Water Quality Classification Map, so as to clarify the value of conserved landscapes along stream corridors, and the need for increasing municipal commitment to strengthening stream buffer regulations?**

Park Watershed agrees with a series of comments provided by Rivers Alliance of Connecticut,

- **Updates to Numeric Water Quality Criteria:** "if a federally recommended criterion is stricter or more complete than the current standard, so it would protect Connecticut's water better, by all means adopt it. Any of EPA's recommendations that are less protective should not be adopted." This is especially important to Park River watershed tributaries that are impaired or degraded, and so depend upon future commitment – and so regulatory motivation to prompt investment in revitalization and conservation of the stream corridors.
- **Define Highest Attainable Use:** "...Highest Attainable Use is evaluated during a study of how a waterbody is used..." This has the potential to eliminate improvement of polluted waterways. People stay away from rivers they know are polluted by unpermitted or permitted effluents. This means those rivers will not be used for any higher use during a study. If Connecticut DEEP is mandated by the federal government to revise Highest Attainable Use to mean only what its use is now, maybe we need to address this at the federal level." Given that the North and South Branches are listed as impaired, and tributaries throughout the Park River watershed are degraded, we are especially concerned with any changes in federal or state regulations which would minimize efforts to improve water quality.

Park Watershed highly recommends **increased downstream protections**. While 68% of the North Branch Park River watershed is within the Town of Bloomfield and 14% within the Town of West Hartford; property owners in the northwestern neighborhoods of Hartford, while only 11% of the watershed, are disproportionately confronted with sewage-laden flood waters dispersing waste onto their properties. Park Watershed has been working with North Central Conservation District to reduce stormwater runoff from area parking lots, yet clearly there needs to be increased regulations on upstream development – and a comprehensive stream corridor plan to reduce further downstream erosion and flooding, and incentivize revitalization of the stream corridor wetlands.

Park Watershed as repeatedly requested that the City of Hartford and the State of Connecticut develop a comprehensive plan for the impaired North Branch Park River stream corridor (~5.4 miles) that would address site specific opportunities to improve water quality in relationship to other concerns such as flood control, safe public access and wildlife habitat. For this reason, Park Watershed looks forward to the May/June Integrated Water Resource Management Update, the purpose being "water quality planning effort to identify water quality issues and associated water bodies for the development of Action Plans to restore or protect water quality". Please consider hosting discussion or public comment specifically focused on inland urban-suburban water resource management issues.

Thank you for receiving my comments in the public record.

Sincerely,

Mary Rickel Pelletier
Founding Director of Park Watershed

C:

Representative Ritter

Senator McCrory

Park Watershed Board

Rivers Alliance of Connecticut