



April 5, 2019

Tracy Iott
Connecticut Department of Energy and Environmental Protection
Land & Water Resources Division
79 Elm Street
Hartford, CT 06106-5127

Dear Ms. Iott,

Thank you for the opportunity to provide input on the Connecticut Department of Energy and Environmental Protection's review of its Water Quality Standards. The standards are an essential tool in protecting water quality and setting the standard for what we want for our rivers and streams.

Regarding topics identified by DEEP for consideration

- **Updates to Numeric Water Quality Criteria:** The DEEP should maintain its high standards for our waters. Any new recommendations and changes made by the EPA that are more protective to human and environmental health should be adopted. However, any criteria in which a change or recommendation has been made that is less protective of human and environmental health should not be adopted.
- **Revise the Low Flow Statistic Applicable to Fresh Waters:** What time period would be used to calculate Q99? NOAA uses 30 years for their calculation of weather normal.
- **Extended Disinfection Period:** We support the extension of the disinfection period to April 1 through November 1. There is plenty of evidence for year-round use of our rivers and streams by paddlers, anglers, rowers and others. The ultimate goal should be a conversion to year-round UV disinfection which does not produce the chemical residuals or byproducts of chlorine disinfection.
- **Define Highest Attainable Use:** With the understanding that state water quality standards must be consistent with federal regulations, the term "attainable" feels too subjective to allow for protection and improvement of water quality in Connecticut's waterways. While a Use Attainability Analysis which should be "a structured scientific assessment of factors affecting the attainment" must be conducted to remove an existing use, CT DEEP should take care in revising its regulations so as to ensure that existing uses cannot not be removed in cases where the responsible party is averse to consider or implement a remedy as opposed to a remedy being non-existent. CRC looks forward to carefully reviewing any language that ensures consistency with the EPA's 2015 regulatory revisions.

- **Downstream Protection:** Downstream protections are currently only specified for discharge to wetlands and impairments due to nitrogen and phosphorus. The state of Connecticut should take this opportunity to develop stronger narrative and numerical criteria to protect downstream waters.
- **Water Quality Classification Maps:** DEEP should most certainly take this opportunity to ensure groundwater classifications are consistent with Aquifer Protection areas.

Regarding topics not identified by DEEP for consideration

Thermal limits need to be better integrated into Connecticut's Water Quality Standards to be truly protective of cold water fish species and healthy river ecology. Despite threats from climate change exacerbated by land use changes that continue to degrade our high quality waters, Connecticut has not updated or even considered updating its temperature criteria. High quality headwater streams and tributaries not under the protection of public water supply are at the mercy of the strength or weakness of wetland and zoning ordinances that can differ greatly in 169 town halls of Connecticut. Since Connecticut's last triennial review, four members of DEEP's own staff in partnership with USGS published, "Summer Thermal Thresholds of Fish Community Transitions in Connecticut Streams." I encourage DEEP to take this research into consideration to update and better integrate thermal limits.

Sincerely,



Alicea Charamut

River Steward