



**Housatonic Valley Association**

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To: Traci Iott  
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BUREAU OF LAND PROTECTION AND LAND REUSE  
PLANNING STANDARDS DIVISION

MAR 16 2010

From: Jenifer Gunther, Water Protection Manager  
Housatonic Valley Association  
150 Kent Road  
PO Box 28  
Cornwall Bridge, CT 06754



Date: March 16, 2010

**Re: Proposed Changes to Connecticut Water Quality Standards**

Dear Ms. Iott,

The Housatonic Valley Association (HVA) is a non-profit watershed conservation organization. Our mission is to conserve the environmental health and natural character of communities within the Housatonic Watershed by protecting land and water throughout the 2,000 square-mile tri-state region. Our goals are healthy rivers and streams, clean drinking water and conserved natural places for future generations. We work through technical assistance, education and advocacy for sound public policy.

HVA provides the following comments on proposed revisions to the Connecticut Water Quality Standards.

- (1) Overall, we support the replacement of the current dual classification system (existing/goal) to a goal only classification system. This will clarify management strategies and expectations for regulated uses.
- (2) **Standard 5** allows temporary discharges to Outstanding National Resource Waters that would have 'insignificant changes to water quality.' We are concerned that this is contrary to what should be the overriding goal of maintaining and improving, and not degrading, water quality across the state. In particular, Outstanding National Resource Waters should be protected against any and all water quality threats. We oppose this language and believe that no discharges, no matter how temporary or "insignificant" should be allowed to these water bodies.
- (3) **Standard 9** allows discharges to AA, A and SA waters in certain approved situations. Again, we are concerned that this is contrary to what should be

Connecticut's overriding anti-degradation goal and policy. Instead, this language would permit discharges to critical drinking water supplies and to our highest quality water bodies. We oppose this language.

(4) **Standard 11** (and elsewhere as appropriate) should at a minimum include language that requires that "flow levels should be maintained that are sufficient to support aquatic life."

(5) **Standard 19** does not sufficiently protect against nutrient pollution that creates imbalances in aquatic systems. Language should go beyond Best Management Practices and include either a numeric standard or a description of unacceptable conditions. This may specifically require a more coordinated effort with TMDLs and NPDES permits, but is necessary to reduce loading on stressed water bodies and on Long Island Sound.

(6) **In the designated uses and criteria nutrients section** - We strongly object to the definition of natural condition as conditions "that are achieved through Best Management Practices." Natural conditions are those that occur naturally, without manmade impacts.

(7) **In Designated uses and criteria** - We strongly support the addition of the use of the biological condition compared to a 6 tier stressor gradient because this will improve the ability to track long term changes in water quality and improve conditions over time.

(8) **In designated uses and criteria** - We support most of the changes to the temperature criteria. However, we are concerned that upland and coldwater streams will still be at risk. While we agree that allowable increases should not exceed temperature limits of present aquatic life, we strongly recommend that allowable increases should not exceed the potential future aquatic life that could ultimately be supported by a particular water body. For example, a stream might currently support brown trout, but over time becomes clean enough to support brook trout. If allowable temperature discharges only take into account the brown trout population, then brook trout will never be restored to the stream. We strongly believe that our goal should be to restore water bodies to the highest quality attainable, wherever possible.

We appreciate this opportunity to comment.