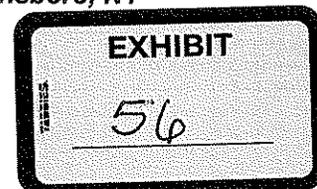


Norwalk River Watershed Initiative

Serving New Canaan, Norwalk, Redding, Ridgefield, Weston, and Wilton, CT, and Lewisboro, NY

March 9, 2010

Paul E. Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street
Hartford, CT 06106-5127



BUREAU OF WATER PROTECTION AND LAND REUSE
OFFICE OF THE BUREAU CHIEF

MAR 16 2010

RE: Proposed Revisions to CT Water Quality Standards

Dear Mr. Stacey:

The Norwalk River Watershed Initiative is a partnership among the seven watershed municipalities; federal and state governments; conservation and environmental groups; businesses and the public to address local water quality and resource protection issues within the Norwalk River Watershed. The document guiding the Initiative's ongoing activities, *The Norwalk River Watershed Action Plan* (adopted by all watershed towns and federal and state partners in 1998 and reaffirmed in 2004) includes major goals that call for habitat protection and conservation, sustainable land use management, surface and ground water quality protection and restoration, and stewardship and education.

We believe that the proposed revisions and additions to the CT Water Quality Standards are consistent with *The Norwalk River Watershed Action Plan*. As noted in the Action Plan, one of our primary goals is to "restore and protect surface and ground water to meet state water quality standards throughout the watershed such that the Norwalk River supports its designated uses (e.g. fishing, swimming, drinking water)". The revisions to numeric criteria for toxic pollutants and the addition of a Biological Condition Gradient, Anti-degradation Implementation Policy and standards for temperature and dissolved oxygen in marine waters will complement our continued efforts to restore the Norwalk River Watershed system.

We are encouraged by the Department's inclusion of a Nutrient Reduction Strategy with regards to phosphorous. Our members are concerned about the potential permitting impasse for existing publicly-owned wastewater treatment facilities due to the lack of agreement on numeric phosphorus criteria between DEP and EPA. However, the use of a "best attainable reference approach" together with a rigorous implementation of the Anti-Degradation policy, stringent requirement of Best Management Practices and the monitoring and assessment for establishing a TMDL is a strong first step in addressing the nutrient overload in Connecticut waters. We look forward to the adoption of effects-based criteria for phosphorous in the future should these strategies prove ineffective in achieving full support of designated uses.

Thank you in advance for consideration of these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alexis Cherichetti". The signature is fluid and cursive.

Alexis Cherichetti
NRWI Advisory Committee Co-Chairs

A handwritten signature in dark ink, appearing to read "Michael Law". The signature is more stylized and less legible than the one above.

Michael Law