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DEPT. OF ENVIRONMENTAL PROTECTION
OFFICE OF THE COMMISSIONER

TO: CT DEP
FROM: Robert Gregorski
President- Naugatuck River Watershed Association, Inc.
RE: Revised CT Water Quality Standards, Public Hearing
Date: February 28, 2010

The Naugatuck River Watershed Association, Inc. is a citizen's, non-profit ecological organization dedicated to the restoration, conservation and development of the Naugatuck River Watershed as a multi-use resource. It will work to enhance the river's scenic beauty, recreational uses and economic value. To enjoy clean air and water and unpolluted land is our fundamental right. The NRWA is prepared to defend that right and to act as a voice of public concern in protecting the air, water and land in the watershed.

Thank you for this opportunity to offer comments concerning this Revision.

NRWA believes that the **revised language** on nutrient standards is weak and **should be strengthened**. Nutrient standards should be distinct from drinking-water standards

NRWA requests that **numeric criteria for phosphorus be included**.

Please strengthen -- 19) Point and non-point sources of phosphorus and nitrogen. Other sections on nutrient loading are not definitive.

Please clarify "natural" in -- 8. *Water Quality Criteria do not apply to certain conditions brought about by natural causes. Natural hydrologic and geologic conditions ...* Suggest that the definition of "natural" not be dependent on economic and institutional deliberations.

What are the goals/objectives of **Standard 9**? The new language would allow discharge of domestic sewage to surface waters classified A or SA.

Robert Gregorski 2/28/10

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