

Dear Mr. Hust:

The Department of Defense (DoD) Regional Environmental Coordinator (REC) for U.S. Environmental Protection Agency (EPA) Region I, on behalf of the military services, is responsible for coordinating responses to environmental policies and regulatory matters of interest. We appreciate the opportunity to provide comments from the Navy for your consideration in response to the subject public notice regarding stream flow classifications. Enclosed are our comments.

A hard copy will follow in the regular mail.

Will
William Bullard
NAVFACMIDLANT EV14
Senior Water Program Manager
Navy/DOD REC Support
757-341-0429



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION MID-ATLANTIC
1510 GILBERT ST.
NORFOLK, VA 23511-2737

IN REPLY REFER TO:

5090
EVN40/09/553
DEC 27 2013

Mr. Robert Hust
Bureau of Water Protection and Land Reuse
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Dear Mr. Hust:

SUBJECT: DOD COMMENTS TO PROPOSED STREAM FLOW CLASSIFICATIONS
FOR THE SOUTHEAST COASTAL, PAWCATUCK AND THAMES MAJOR
RIVER BASINS

As the Department of Defense (DoD) Regional Environmental Coordinator (REC) for U.S. Environmental Protection Agency (EPA) Region 1 and on behalf of the military services, the Commander, Navy Region Mid-Atlantic is responsible for coordinating responses to environmental policies and regulatory matters of interest. We appreciate the opportunity to provide comments from the Navy for your consideration in response to the subject public notice regarding stream flow classifications. Enclosed are our comments.

If you have any questions, the technical point contact for this matter is Mr. William Bullard, Senior Water Program Manager, at (757) 341-0429 or william.bullard1@navy.mil.

Sincerely,

A handwritten signature in black ink that reads "Sean Heaney".

SEAN HEANEY
Director for Regional
Environmental Coordination
By direction of the Commander

Enclosure

Copy to:
SUBASENLON (EV)
U.S. Army REC, Region I (Mr. Robert Muhly)
U.S. Air Force REC, Regions I, III (Mr. Ron Joyner)

**DOD COMMENTS TO PROPOSED STREAM FLOW CLASSIFICATIONS FOR THE SOUTHEAST
COASTAL, PAWCATUCK AND THAMES MAJOR RIVER BASINS**

The majority of Stream Segment 108,001,686 from the National Hydrography Dataset occurs on Navy Submarine Base New London (SUBASENLON). The Connecticut Department of Energy and Environmental Protection (CTDEEP) proposes to classify this stream segment as Class 3. The Navy reviewed the Narrative Standards and the interactive map showing the Certainty Factors and Hydrologic Stressors of Stream Segment 108,001,686. Class 3 streams "shall exhibit, at all times, the depth, volume, velocity and variation of stream flow and water levels necessary to support and maintain habitat conditions supportive of an aquatic, biological community moderately altered from that typically present in free-flowing river or stream systems". The portion of the stream segment on SUBASENLON does not meet the Class 3 narrative standard for the following reasons:

- This stream segment is approximately 2,000 feet (ft.) long. Approximately 1,200 ft., or 60 percent of the segment is routed through either a culvert or concrete/concrete block lined channel. These conditions do not support or maintain habitat conditions suitable for aquatic and other biological communities.
- The volume and velocity of stream flow and water levels are driven by precipitation and stormwater runoff from upstream developed areas and therefore highly variable. In addition, SUBASENLON Environmental Division personnel have observed no flow conditions during periods of the summer resulting in a dry stream bed providing unsuitable habitat for aquatic and other biological communities.
- This stream segment lies almost entirely within SUBASENLON Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) Installation Restoration (IR) Site 3. The segment also was impacted by adjacent IR sites: Site 2A (a capped landfill) and Site 2B (pesticides). Although SUBASENLON has completed the remedial action approved by the U.S. Environmental Protection Agency and CTDEEP, SUBASENLON is required to monitor the area for natural attenuation until Remedial Goals (RGs) are met.

The Navy believes the stream segment should be given a Class 4 classification and requests CTDEEP concurrence on this proposed change. Factors identified in the Narrative Standard for a Class 4

stream compared to SUBASENLON Stream Segment 108,001,686 are provided in Table 1 for CTDEEP consideration.

Table 1. Comparison of the Class 4 Narrative Standard to Stream Segment 108,001,686

Class 4 Narrative Standard	Stream Segment 108,001,686
Exhibits substantially altered stream flow condition caused by human activity while giving consideration to societal needs, economic costs, and environmental impacts	Development has definitely altered stream flow conditions in the segment.
Extent of prior channel modification	A significant portion of the channel has been modified.
Current impact of development and impervious cover in the watershed	SUBASENLON is highly developed with significant coverage by impervious surfaces. The area surrounding SUBASENLON is also developed with transportation infrastructure, residential and commercial development. These conditions alter stream flow patterns from a natural condition.
Overriding societal needs that cannot otherwise be met	There is no overriding societal need for a Class 3 designation.
Economic impact that would substantially impair or otherwise detrimentally affect the economy of the community in which the segment is located or of the state	There is no economic impact that would substantially impair or otherwise detrimentally affect the economy of the community in which the segment is located or of the state.
Associated environmental impacts to other river or stream segments	There will be no associated environmental impacts to other river or stream segments.
Existing biological community	Although a biological survey has not been conducted in this stream segment, habitat indicators that would support a biological community are generally absent (i.e., lack of natural substrate in the majority of the Stream Segment, culvert and concrete/concrete block channel modifications, and little to no riparian cover).

Class 4 Narrative Standard	Stream Segment 108,001,686
Margin of safety of the community water system utilizing the river or stream segment as an existing public water supply source	The Navy is not aware of any community water system utilization of the Thames River in the area of SUBASENLON.