

June 16, 2020

Rebecca Jascot
Water Planning and Management Division
Bureau of Water Protection and Land Reuse
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127



Re: PRWC Comments on DEEP's Draft 2020 Integrated Water Quality Report

Dear Ms. Jascot –

On behalf of the Pomperaug River Watershed Coalition (PRWC) I am submitting comments on the draft Connecticut Department of Energy and Environmental Protection's (DEEP) 2020 Integrated Water Quality Report (IWQR). The Pomperaug Watershed is a 90 square-mile basin, which is a vibrant aquatic habitat that supports a healthy fish population; a key source for high quality drinking water; and a priceless source of scenic beauty. It includes three main rivers: the Pomperaug, Nonnewaug, and Weekeepeemee, and the underground aquifer, as well as the land that encompasses these water resources. Since 1999, PRWC has been responding to increasing pressures that land development activities put on the local water supply. The vision of PRWC's founders was to ensure the quality and quantity of our region's water through three main activities: scientific research, education, and practical support through advocacy and advice. Our goals are to make sure that the people who depend upon our water understand the resource and take appropriate actions to preserve and protect it. As a convener of stakeholders, we work to ensure that everyone with interests in the region has the tools and resources they need to understand and care for this precious and fragile resource.

PRWC has a great appreciation for the extensive monitoring, research, analysis and synthesis that goes into this comprehensive report. We commend DEEP for presenting a well-organized, well-illustrated, easy-to-follow report that: 1) describes the basis for and nature of the assessments, 2) provides a summary status of the State's waters, and 3) presents comprehensive status listings for individual waterbody segments within the supporting appendices. We also applaud DEEP for its continued improvements in the public outreach on availability of documents such as these. Well done.

While our organization is invested in the management of water resources statewide, we have focused our review to items related to the Pomperaug River Basin as we are most familiar with these particular waters. We found the Aquatic Life and Recreation designations for waterbody segments included in Appendix A-1 to be in agreement with past findings and our anticipated outcomes of DEEP's recent stream assessments. While we had conversations with the Monitoring & Assessment Division's staff on including certain streams like Bullet Hill Brook in the latest round of assessments, we are very pleased to see a number of other important tributaries also included within the aquatic life support assessments as

several had not been surveyed since 1991 according to the fish community data viewer available through CT ECO's interactive map viewer. We really appreciate the attention that was given to streams within the Pomperaug Basin during this reporting cycle.

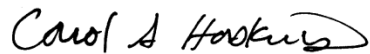
In our review of the Report, we did note a few items that we wish to highlight with comments and questions. They are as follows:

1. We noted two waterbodies (CT68000-10_01, Unnamed Tributary Pomperaug River and CT6802-05_01, Harvey Brook-01) listed in the Assessments Results in Appendix A (pages 112-113) that indicate "Not Assessed" for both Aquatic Life and for Recreation. If these streams were not assessed, why are they included in the assessments results? Is there inclusion in this list based on results of DEEP's predictive modeling?
2. We believe there is a typo in the location description for Segment CT6803-02_01 Unnamed Tributary to Sprain Brook (Washington)-01. The description reads "Mouth at Confluence of Spring Brook..." instead of Sprain Brook. We hope that this would be corrected in the database to avoid future confusion in locating this site.
3. The assessment result of segment CT6806-00_01, Transylvania Brook (Southbury)-01 listed in Appendix A-1 indicates that use for Aquatic Life is Not Supporting. Appendix B-4 lists the cause for this being "Flow Regime Impairment". While we agree with this designation based on the timing of the assessments included within this report, we want to applaud the Town of Southbury for addressing the culverts located at the mouth of this stream where it joins into the Pomperaug River (East Flat Hill Road). The culverts were both undersized and perched, creating a significant barrier for passage of fish and wildlife. In 2019, the culverts were replaced with a bridge. In 2018, a similar barrier located at the Spruce Brook Road crossing was also converted to a bridge. Together, the new crossings should alleviate the Not Supporting designation for Aquatic Life. That is, assuming the previously listed cause for this impairment (Ammonia (Unionized), Chlorine, Copper, Zinc) is no longer considered a factor. As you know, the waste water treatment plant that was the source of these pollutants was taken fully offline in 2013. We ask that DEEP continues regular monitoring and assessment of this segment with the anticipation that it should soon be delisted from the Impaired Waters List.
4. Within the Priority List of Waters for Action Plan Development found in Appendix C-1, PRWC is pleased to see that DEEP has prioritized developing a TMDL Alternative for Phosphorus Discharges to Freshwater Wadable Streams including the segments of the Pomperaug River located downstream of a wastewater treatment facility. We are similarly pleased to see Transylvania Brook included in the priority list for developing a Bacteria TMDL. That said, we do hope to see an opportunity for public participation in the development of these TMDLs. We recognize the time-consuming nature of the public participation process may not be realistic. However, our past experience with these (i.e. Bacteria TMDL for Pomperaug River and Weekeepeemee River) is that the TMDLs are generic both in their evaluation of contributing

pollutant sources and recommended actions to address them. Additionally, the recommended actions call for implementation by local stakeholders (landowners, town agencies, watershed association, etc) who are often not aware such plans exist.

Thank you for your assessment and stewardship of Connecticut's waters and for the opportunity to comment on this draft.

Sincerely,

A handwritten signature in black ink that reads "Carol A. Haskins". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Carol A. Haskins
Executive Director