



July 6, 2022

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

Dear Ms. Jascot,

Thank you for the opportunity to comment on the 2022 Integrated Water Quality Report. We appreciate the work the department puts into managing and protecting our water resources.

More Info to Understand Flow Regime Modifications

The methodology developed by Bellucci, Becker, Czarnowski and Fitting is essential in providing data and metrics necessary to assess and categorize streams that are impaired for flow that is not due to impoundment or other physical alteration of surface water. This information is critical in our decision making process for diversion permits and any diversion that may fall below the DEEP permitting threshold of 50K gpd that is causing a significant impairment that may need to be evaluated by local IWWCs.

If possible, it would be helpful to include streamflow classification for the segments listed as impaired for "Flow Regime Modification" in the listings for Category 4c. This report is not only a mandatory CWA requirement, but a go-to for information for watershed managers, local and regional decision makers, and anyone who advocates for our water resources. Having streamflow classification information included in these listings will help the user better understand the underlying cause of any flow regime modification.

Measure More to Manage More

The staff that work for the water quality monitoring section and the volunteer monitoring program do an excellent job with the resources they have available. But the number of segments that go unassessed with each cycle is of great concern.

The number of assessments and definitive recreational use support determinations could increase significantly with a modest increase in resources to the monitoring program along with grants to organizations that can contribute data that can be used for these assessments. Massachusetts

Department of Environmental Protection is in the fourth year of their Water Quality Monitoring Grant Program. This year's grant round will be distributed approximately \$150,000 in available funds in up to \$15,000 increments to nonprofit organizations for monitoring for bacteria.

Funding cuts to DEEP over the past decade has led to program and staff reductions. In many cases, some or all of these programs were carried on by local volunteer groups and non-profits. Running these programs are costly and often difficult to fund. Such is the case of water quality monitoring programs. We appreciate the budget constraints with which the state and the Department has had to contend but a modest investment in helping your partners fund some of the measuring will mean DEEP staff can spend more time doing the more complicated measurements and on the management aspect.

We are now experiencing the weather patterns that has predicted for decades that would come with climate change. Now more than ever, we need the data to support programmatic and regulatory changes necessary to adapt and be more resilient in the face of these changes. A near-term recommendation of the Working and Natural Lands Workgroup: Rivers Sub-Working Group of the Governor's Council on Climate change was, "Establish a funding mechanism similar to Massachusetts' Water Quality Grant Program to provide resources to NGOs to supplement DEEP's ambient monitoring program to reduce the number of streams that are unassessed or do not have sufficient data for each Water Quality Report cycle."

There is currently more funding than ever before available for programs that will assist in combating climate change. We hope you'll consider implementing a water quality monitoring grant program similar to that of Massachusetts in order to decrease data gaps with a portion of this funding that is or will become available.

Thank you again for this opportunity to comment on the report.

Sincerely,



Alicea Charamut
Executive Director