



June 17, 2020

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 2020 Integrated Water Quality Report. We appreciate the work the department puts into managing and protecting our water resources.

An Ounce of Prevention is Worth a Pound of Cure

Thank you for including a protection plan as a management strategy in this report. The Department's primary focus should, of course, be to restore our waters to supporting life and recreation and this effort should continue to receive the majority of funds and resources. However, putting some resources toward a low-cost prevention program will save significant money and effort on future restoration.

While the Biological Condition Gradient method is helpful in identifying water bodies where water quality is beginning to degrade, bringing further degradation to heel is challenging. Our "home rule" approach to stormwater, wetlands, and watercourses management makes addressing water quality at any basin scale difficult. The Natchaug River and Mount Hope Watershed Protection Plan is a recipe for success in that there is already a cohesive and engaged stakeholder group in these watersheds. We hope that this action plan will result in a "playbook" that can be replicated in other basins to maintain high quality waters and prevent degradation of at risk waters.

Measure More to Manage More

"You can't manage what you don't measure," was a statement made during the June 9th informational meeting on the report. We couldn't agree more. To be clear, 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 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 second year of their Water Quality Monitoring Grant Program. This year's grant round will distribute approximately \$200,000 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 hope you'll consider implementing a water quality monitoring grant program similar to that of Massachusetts in order to decrease data gaps.

Addressing Non-Pollutant Impairments

While prioritization for action plans falls under a different process, this is an opportunity to point out that non-pollutant impairments need to be addressed through some sort of action plan. There are streams that have been on the impaired list for decades. Some have relief in sight with compliance with streamflow regulations by the end of this decade but some rivers and streams are either exempt from streamflow regulations or have no protections under state law. We cannot continue to have a situation where streams are documented to be impaired by altered flow regimes with no recourse in sight for even a fraction of these rivers and streams.

Thank you for listing non-native aquatic plants as an impairment for recreation. Sadly, with a combination of new, very aggressive aquatic invasive plants (such as hydrilla in the Connecticut River) and no centralized invasive species management at DEEP, this list has the potential to grow exponentially every two years. DEEP must reestablish a dedicated position to be the hub of coordination and management of invasive species management in Connecticut. Right now our invasive species management (aquatic invasive plants, in particular) is done piecemeal. It's not working. DEEP must put resources into filling this gaping hole in water quality management.

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

Sincerely,



Alicea Charamut
Executive Director