



January 21, 2020

Alexander Ericson
Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Hartford, CT 06106

Re: Draft Section 401 Water Quality Certification 20201005-WQC

Thank you for the opportunity to comment on the draft Section 401 Water Quality Certification for the pipeline spur that will connect existing pipeline infrastructure with the proposed NTE Killingly Energy Center.

Rivers Alliance asks that DEEP deny this permit with prejudice.

It is always difficult to find a balance between meeting a public need and reducing or eliminating any environmental harm that may come about by meeting that need. Connecticut, however, does not need another gas plant. The NTE Killingly Energy Center project undermines state goals to reduce carbon emissions and will hinder our ability to make progress on longer-term recommendations being developed by the Governor's Council on Climate Change. All of the water resources that will be impacted by the installation of this pipeline spur are ecosystems that we must protect as they play key roles in resilience to climate change.

ANY loss of forested wetland, riparian buffer, and critical cold water habitat is too much – even with permit conditions and mitigation imposed to minimize impact.

Loss of forested wetland

17,474 square feet of forested wetland will be lost. Flood attenuation is an essential service that wetlands provide. Deforestation can reduce the ability of a wetland to provide this service.

Water quality degradation and loss of brook trout habitat

Durkee Brook is a Class A stream that is habitat for brook trout. Pipeline construction and construction activities within the Durkee Brook watershed are likely to degrade water quality through siltation and temperature increases due to loss of riparian buffer protections. The need

for better protection for high-quality cold water habitat was highlighted in the Rivers Sub-working Group report of the GC3.

We refer to the report by Downstream Strategies submitted by Sarah Krame on behalf of the Sierra Club for a more detailed account of potential impacts to water quality and brook trout populations that this project is likely to impose.

We will never make progress on building a more resilient Connecticut if state actions and decisions are a step backwards, instead of forward in meeting our carbon reduction goals and protecting the very ecosystem services that will help us become more resilient.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alicea Charamut', with a stylized, cursive script.

Alicea Charamut
Executive Director