

Chris Sullivan
Environmental Analyst II
Connecticut Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse, Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127
June 9, 2014

RE: Comments on Draft CT DEEP Pawcatuck River Watershed Bacteria TMDL

Dear Mr. Sullivan,

Save The Bay has reviewed the Draft Bacteria TMDL for the Pawcatuck River watershed and commend CTDEEP for conducting this comprehensive water quality study. Save The Bay supports the findings and recommendations for reducing bacterial contamination within the Pawcatuck River watershed. We appreciate the efforts of the agency to involve both Rhode Island and Connecticut communities in these studies and to educate the public about the present water quality issues and their solutions.

Save The Bay remains concerned with the water quality results for the Pawcatuck River. We will continue to monitor the river and Bay twice a month during the months of April to October to gather and assess new data to support the need for continued water quality improvements to this area.

Save The Bay would like to submit the following comments and actions that need to be further pursued to address these water quality impairments:

- 1) In figure 3 on page 14, the impaired segments do not match up with the Rhode Island segments. For example, the RIDEM segment, RI0008038E-01A, is further south than the CTDEEP segment CT-E1_001-SB. This causes confusion from a public perspective in terms of understanding the boundaries. Why are these lines different and is it possible to move these boundaries so that they are consistent across state/town borders?
- 2) Figure 4 on page 15 places our sampling station, WW442, on the Connecticut side of the river. The station is clearly located on the Rhode Island side of the Pawcatuck River.
- 3) On page 23, within Table 3, the wrong GPS coordinates are provided for station WW443. Our station, WW443, is actually located at the same coordinates as RIDEM's station 12-3. Our station identification number is actually the number provided by the University of Rhode Island's Watershed Watch. We have corrected the error in coordinates on our side.

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- 4) On pages 75-86, tables 22 and 23 contain sampling data from RIDEM. The newest data goes back to 2010. Since 2011, Save The Bay has been providing boat support to RIDEM to collect bacteria data within the estuary. Currently there are three additional years of data (2011-2013) from this sampling that should be used to update these tables and percent reductions. Save The Bay would also be happy to provide CTDEEP the same opportunity to come out with RIDEM and coordinate sampling within the estuary if interested.
- 5) More open and transparent communication needs to occur between the two states and two towns, especially now that there are TMDLs for both sides of the river. As the towns work to implement some of the strategies outlined in the TMDLs, it is essential that resources are shared, joint funding opportunities are pursued, and information on project is communicated.
- 6) A wildlife management plan for waterfowl within the town of Stonington is essential. Since RIDEM released their bacteria TMDL for the Pawcatuck River estuary in 2010, Stonington has taken steps to address illegal feeding of waterfowl. However, more should be done on both sides of the river to address this persistent problem with waterfowl. A management plan needs to be developed by both state agencies and both neighboring towns in order to reduce this population. Guidance from the USEPA and US Fish and Wildlife will be especially important as well. Waterfowl, specifically swans and Canada geese, continue to have a detrimental effect on localized water quality as well as lead to the destruction of coastal habitats, such as salt marshes and coastal buffers.
- 7) In addition, a thorough public education and outreach program to address feeding of local waterfowl along the river is also an important step to informing the public about their individual actions. This program needs to be presented to landowners and the public on both sides of the river.
- 8) Approved harbor management plans for both Westerly and Stonington need to be completed and approved. This will give authority to the local harbormasters to enforce *No Discharge* laws. While the two towns have an incredible marine pump-out program, more on-the-water enforcement is essential.
- 9) Enforcement by CTDEEP and RIDEM along the river and within the Bay has been almost completely absent over the past several years. A continued RIDEM enforcement presence in the river and Bay is vital. It is our hope that the both states can provide enforcement vessels and staff that will be able to patrol these waters.
- 10) Save The Bay would like to see a more thorough list of implementation strategies within this TMDL. While the strategies listed are a good start, more guidance from the state would be helpful to the town of Stonington especially in terms of clearly identifying priority areas. Additional techniques and needs that could be pursued by both the state and town include continued sampling for personal care products and pharmaceuticals to identify illicit discharges, reviewing and potentially revising existing development regulations/town ordinances to offer more protection to the river, identification of potential funding sources, and a town-wide needs assessment for structural BMPs.

The Pawcatuck River is a vital tributary to Little Narragansett Bay. Despite the water quality challenges outlined in this draft TMDL, Save The Bay remains committed to working with the agencies and the towns to reduce bacteria impairments to *both* sides of the river and Bay. Save The Bay believes this should be a top priority for RI and CT. Continued monitoring will be an essential component to this program's success. We appreciate the state's efforts to move up the timeline on this TMDL and appreciate all of your time and energy to produce this report.

If you have any further questions or would like to discuss these comments, please feel free to call me at 401.315.2709 or email me at dprescott@savebay.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Prescott', with a stylized flourish at the end.

David Prescott
South County Coastkeeper
South Coast Center
Westerly, RI