

STATE OF CONNECTICUT INTEGRATED WATER QUALITY REPORT

Summary of Public Comments and Responses to Comments

FINAL October, 2014



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Robert J. Klee, Commissioner

BACKGROUND

The Department of Energy and Environmental Protection (DEEP) published a draft version of the *State of Connecticut Integrated Water Quality Report* (“*Report*”) on July, 28, 2014 and accepted comments until August 29, 2014. The *Report* was prepared by DEEP to fulfill requirements of the Federal Clean Water Act under Sections 305(b) and 303(d). The *Report* was posted on the Department’s website at <http://www.ct.gov/deep/iwqr> for view and download by interested parties. Paper copies were also made available on request. Letters noticing the availability of these documents were sent to interested parties including: citizens; conservation organizations; universities; environmental consulting firms; water supply companies; tribal nations; and federal, state, and local officials. Notices were sent via email when possible and printed mailings if electronic communication was not possible with the party. An informational meeting for the general public was held at DEEP Headquarters on August 13, 2014. The notice of the availability of the *Report* as well as the notice of the informational meeting was published in the Norwich Bulletin, Connecticut Post, Hartford Courant, Waterbury Republican American, and New Haven Register.

During the draft review process, formatting, typographical and grammatical errors were corrected in the *Report* as needed. In this document, comments received during the public process period are summarized with the Department’s responses immediately following each comment. The complete text of these comments is attached as Appendix A.

PUBLIC COMMENTS

EPA New England, Mary Garren, Water Quality Branch

Comment :CT1001-00-1-L1_01 Wyassup Lake (North Stonington) and CT4308-00-1-L2_01 Compensating Reservoir (L. McDonough) (Barkhamsted/New Hartford): It is premature to delist these segments until they are officially included under the Northeast mercury TMDL. EPA recommends delisting these segments in the next listing cycle.

Response: The Department agrees these segments should not be delisted until they are formally under the Northeast mercury TMDL. For the 2014 reporting cycle, these segments will remain in Category 5 and will be removed from the Reconciliation list in the final document. CT DEEP will take the necessary steps to pursue their delisting for the next reporting cycle.

Comment :CT3200-00_01 Natchaug River: The reconciliation table shows this segment as being delisted for recreation/e. coli because new data shows it supports its recreational use. Natchaug River/Lauter Park Beach is shown in Table 3-5 (E. coli/recreation impairment) in category 2. Is this the same segment?

Response: The two segments are the same, however the information in Table 3-5 may be causing confusion. First, the title for Table 3-5 will be corrected to indicate the table as a list of segments with approved TMDLs and not just segments in Category 4a. Second, the segment ID will be added to identify the specific segments in the table. These two revisions will be made in Table 3-5 in the final document to provide clear understanding of segments found in both Table 3-5 and 3-8.

Comment :CT4316-00_02 Thompson Brook: Thompson Brook was covered under the 2012 Statewide Bacteria TMDL (e. coli/recreation impairment). The 2012 TMDL called for significant reductions in E. coli to meet water quality standards. The 305(b) table shows it as not assessed for recreation. The segment is also not listed in Table 3-5 as being in category 4a. Please correct the references to this segment.

Response: Data was available for CT4316-00_02 Thompson Brook and a TMDL was approved by EPA in 2012. Table 3-5 will be corrected to reflect the segment in Category 4a in the final document.

Comment :CT4319-00_01a Salmon Brook, West Branch (Granby)-01a and CT4319-00_01b Salmon Brook, West Branch (Granby/Hartland)-01b: These segments were covered under the 2012 Statewide Bacteria TMDL, not the 2011 Salmon and Mountain Brooks TMDL as shown in the reconciliation table.

Response: The Department has made the revisions to Table 3-8 in the final document as noted.

Comment :CT6806-00_02 Transylvania Brook (Southbury)-02: The geometric mean of 84/100 ml is still in excess of the water quality criteria for enterococci. Attainment of the enterococci criteria of 35/100 ml is necessary to delist this segment. This segment is not appropriate for delisting at this time.

Response:

The initial listing was based on enterococci since that was the applicable indicator under the Water Quality Standards at the time of listing. *E. coli* is the current indicator bacteria criteria for freshwater streams adopted on October 10, 2013 in the Connecticut Water Quality Standards Regulations Sections 22a-426-1 to 22a-426-9 of the Regulations of Connecticut State Agencies. Therefore, we used the *E. coli* indicator per our CALM and data show attainment of recreational use for this segment since the geometric mean of 84 col/100ml is below the geometric mean criterion of 126 col/100 ml. No changes were made to the final document.

Comment :CT6909-00-2-L1_01 Northfield (Reservoir) Brook Lake (Thompson): The comment field in the reconciliation table presents the segment as being listed, as opposed to delisted.

Response: The Department has made the revisions to Table 3-8 in the final document as noted.

Comment :CT7105-01_01 West Branch Pequonnock River (Monroe)-01: The geometric mean of 146/100 ml is still in excess of the water quality criteria for E. coli. Attainment of the E. coli criteria of 126/100 ml is necessary to delist this segment. This segment is not appropriate for delisting at this time.

Response: The Department made an error and agrees with this comment. CT7105-01_01 West Branch Pequonnock River (Monroe)-01 will be removed from the reconciliation list and returned to not supporting for recreation.

Comment :CT7109-02_01 Unnamed Tributary, Sasco Brook (Fairfield)-01: Please clarify if the 6 samples taken within the segment meet the water quality criteria for E. coli.

Response: Yes, 6 samples were collected in segment CT7109-02_01. In making this assessment, the Department also had 22 samples from immediately upstream of this segment and no values exceeded the *E.coli* single sample maximum criterion of 576 col/100ml and geometric mean was 14 col/100ml which is below the 126 col/100ml geometric mean criterion. All these data were factored into the assessment.

Comment :CT-C1_004-SB LIS CB Inner – Hayden Creek, Clinton: The 305b shows this segment as not assessed for shellfishing. The reconciliation table recommends delisting for fecal coliform/shellfishing impairment based on the segment having been listed without data. (Please note that this segment is listed twice in error in the reconciliation table.) However, this segment was part of the 2013 Addendum to the Statewide Bacteria TMDL (fecal coliform/shellfishing impairment). The TMDL called for significant percent reductions in fecal coliform to meet water quality criteria. In light of the existing TMDL, this segment is not appropriate for delisting for attainment of fecal coliform criteria at this time.

Response: The segment was included in the 2013 Appendices for the Statewide Bacteria TMDL. A pollutant load reduction for fecal coliforms was determined for the segment in the *Estuary 10: Clinton* Appendix. The segment is included among the segments with an approved TMDL (EPA Category 4a). The appropriate tables in the final document have been revised to accurately depict the status of the segment.

Comment :CT-W1_005 LIS WB Shore – Southport Harbor (Fairfield), CT-W2_006 LIS WB Shore – Southport Harbor (East), and CT-W2_007 LIS WB Shore – Southport Harbor (West): All three segments are showing as being in category 4a due to 2012 Statewide Bacteria TMDL (fecal coliform/shellfishing). Segment CT-W1_005 LIS WB Inner – Southport Harbor, Fairfield is listed in the reconciliation table because to the 2012 statewide TMDL. Is there a reason that segments CT-W2_006 and CT-W2_007 are not? The reconciliation table is used by EPA to accurately portray the state’s progress in national reporting.

Response: Segments CT-W2_006 and CT-W2_007 were inadvertently omitted from Table 3-8. Revisions were made in the final document to include the segments in the table.

Comment :CT-W2_018 LIS WB Shore - Westcott Cove: This segment is listed in the 305(b) table as not supporting its shellfishing use and in Table 3-4 as being impaired for shellfishing due to fecal coliform. LIS WB Shore- Westcott Cove is showing in category 2 in Table 3-5. Is that an error? It should be presented in category 4a in the table as it was covered under the 2012 Statewide Bacteria TMDL and has not yet been delisted.

Response: CT-W2_018 LIS WB Shore - Westcott Cove is impaired for shellfishing due to fecal coliform and a TMDL was approved in 2012. Table 3-5 was revised in the final document to reflect the segment is in category 4a.

Comment :Page 230, first bullet: While public input may lead to a decision to delist a waterbody, public participation in and of itself is not sufficient reason for delisting.

Response: The Department intended to illustrate that public participation is a significant component of the Impaired Waters List. However, in this context, public comment alone is not sufficient information for delisting a waterbody. The referenced bullet has been removed from the final document.

Comment :Table 3-5: The table listing waterbodies with adopted TMDLs is the only table in the report that does not include waterbody segment ID numbers to distinguish multiple segments that have the same name. EPA recommends that segment numbers for the waters listed in Table 3-5 be included in the report in future listing cycles.

Response: The Department has made the revisions to the table to include the segment ID in the final document.

Board of Directors for the Quinnipiac River Watershed Association (QRWA), Rebecca Martorelli

Comment: A weblink to a map that shows where the referred water body segment ID's are located would be helpful information for our members.

Response: The Department will continue to look for ways to improve our communication on the IWQR for future listing cycles. In the meantime, the Connecticut Environmental Conditions (CTECO) has a simple map viewer-<http://www.cteco.uconn.edu/> that may be helpful for reviewing this and other DEEP reports. The Segment ID is included within the 305b Assessment data layers in the map viewer. No changes were made to the final document.

North Central Conservation District, Natural Resource Specialist, Joanna Shapiro

Comment :On page 79 of the 2014 State of Connecticut Integrated Water Quality Report, Buckhorn Brook (4205-00_01) is listed as Not Supporting its Recreation use. This seems to contradict what is shown within Table 3-4, however, because on page 241 of the report, Buckhorn Brook seems to be left off of the Impaired Waters List (EPA Category 5)

Response: EPA Category 5 is for impaired segments that require a TMDL. A TMDL was approved for Buckhorn Brook (4205-00_01) in 2012. The segment remains impaired for recreation use, but with the approved TMDL (Category 4a), the segment is no longer in Category 5.

Connecticut River Watershed Council, Jacqueline Talbot, River Steward

Comment : We encourage DEEP to further integrate biological standards with the agency and public's understanding of the quality and goals of our waters. For Aquatic Life Use Support (ALUS), the assessments should separate out tiers using the Biological Condition Gradient (BCG) to more effectively characterize waters.

Response: The Department is working towards refining ALUS assessments using the BCG and we anticipate a more refined level of reporting as described above for the 2016 Report. We would encourage continued discussion with CRWC on this topic as we work towards this mutual goal. No changes were made to the final document.

Comment : Bacteria monitoring should align with the disinfection season in CTs Water Quality Standards (WQS). If CT DEEP does expand the required disinfection period for bacteria,

bacteria monitoring and ideally concurrent temperature monitoring should align with the extended season whenever possible.

Response: The Department's current practice is to evaluate indicator bacteria during the disinfection season. Should the disinfection period be extended in the future through changes in the WQS, we will evaluate and likely make changes to the assessment process as well. No changes were made to the final document.

Comment : The Department should consider breaking segment Connecticut River-03 up into two segments—one from the MA border to just north of Hartford, and then that point to Portland.

Response: The Department recognizes that re-segmentation of Connecticut River-03 could be beneficial to water quality management and encourage additional discussion with CRWC on this topic. Additional data are being collected on large rivers under the National Rivers and Stream Assessment Project, and we plan to evaluate how these data might inform segmentation of the Connecticut River as well as other large river systems in Connecticut. No changes were made to the final document.

Comment : We would also like to work more closely with water quality staff on strategizing bacteria, temperature and biological monitoring within the CT River Watershed in CT and invite the use of our webpage for sharing monitoring results.

Response: The Department agrees and looks forward to discussion on these important topics. No changes were made to the final document.

Comment : We agree that Connecticut River-02 should be prioritized for a TMDL for bacteria, as the adjacent segments were in 2012; this will allow for more detailed potential source information and management strategies for that entire stretch above the estuarine region.

Response: Thank you for the comment of support. No changes were made to the final document.

Resident, John Kulhowick

Comment : Increased residential building from 1991 to 2013 may have adversely affected water quality in Bantam Pond contained in Waterbody Segment ID's CT6705-00_04 (Bantam River-04).

Response: The Department shares your concern over the potential impacts of land use change on water quality. Currently, the pond you are referring to is part of Bantam River CT6705-00_04 and our assessment of the river segment show that it fully support aquatic life. We encourage you to contact our lakes program to discuss this matter further. No changes were made to the final document.

Pomperaug River Watershed Coalition, Carol Haskins, Outreach Director

Comment: Figure 1-1, page 11: The highlighted river segment for Regional Basin 68 (Pomperaug River) in the Connecticut Rivers and Lake Basins Index does not reflect the main stem of the Pomperaug River. The upper portion appears to highlight South Brook in Woodbury rather than the upper section of the Pomperaug.

Response: Figure 1-1 was intended to illustrate the location of basins across Connecticut without a high level of detail to specific waterbodies. For the next reporting cycle, the Department will review updated imagery and software to develop a more accurate map of basins across Connecticut. No changes were made to the final document.

Comment: Figure 2-2, page 32 and Figure 2-6, page 36: We feel it would be helpful to the user to orient the map/figure show on this page to a landscape page layout. As a significant graphic showing the 305b Assessment Results, a larger version of the graphic will make it easier to view and interpret.

Response: The Department will continue to look for ways to improve our communication on the IWQR for future listing cycles and can make available a larger version of the map upon request. The Connecticut Environmental Conditions (CTECO) has a simple map viewer- <http://www.cteco.uconn.edu/> that may be helpful for reviewing this and other DEEP reports. No changes were made to the final document.

Comment: Table 2-4, pages 130-132: Included in the table are examples of river segments where “not assessed” is indicated in regards to both Aquatic Life and Recreation. With the status of “Not Assessed” it is unclear why these segments are included in this “Assessments Results” table. The three example segments that called this to our attention were: CT6800-10_01 Unnamed Tributary Pomperaug River Southbury; CT6802-00_03 Nonewaug River-03; and CT6802-05_01 Harvey Brook-01 within the Pomperaug Regional basin (68).

Response: The Department agrees as this was an oversight on our part and will remove waterbodies with no assessments from Table 2.

Comment: Table 2-4, page 131: The location description for segment CT6800-05_01 Bullet Hill Brook (Southbury)-01 should reflect “Old Field Road crossing” rather than “Cedarland (Old Field) Road crossing” as the correct place name.

Response: The Department agrees and will change description to “Old Field Road crossing.” There was no change to the assessment due to this typographical error.

Comment: Table 2-4, page 131: The location description for segment CT6801-00_01 East Spring Brook (Woodbury/Bethlehem)-01 should reflect “Watertown Reservoir” rather than “Bethlehem Reservoir” as the correct place name.

Response: The Department agrees and will change description to “Watertown Reservoir.” There was no change to the assessment due to this typographical error.

Comment: Table 2-4, page 131: The location description for segment CT6801-10_01 Unnamed Tributary Pomperaug River Southbury should reflect “Platt Park” rather than “Plat Park” as the correct place name.

Response: The Department agrees and will change description to “Platt Park.” There was no change to the assessment due to this typographical error.

Comment: Table 2-5, page 131: Segment CT6800-05_01 Bullet Hill Brook (Southbury)-01 is noted as “Fully Supporting” for Aquatic Life. We feel that this designation for 3.56 miles of stream is inaccurate as it does not account for significant channelization of the stream as it spans from U.S. Route 6 (Main Street North, Southbury) near the entrance to the Southbury Plaza upstream along the backside of the shopping plaza. The stream is confined to a concrete channel as it spans the backside of the plaza as it flows between I-84 and Old Waterbury Road in Southbury. In order to reflect this flow regime alteration, we suggest DEEP consider breaking this segment into two or three segments.

Response: Based on our current data availability, the Department’s assessment result in this section fully supporting aquatic life. We would like to work with PRWC to collect the data required to reevaluate the segment of Bullet Hill Brook and we hope we can have discussion on this in the near future. No changes were made to the final document.

Comment: Table 2-5, page 165: Though a river-focus organization, we acknowledge the status of Cat Swamp Pond (Woodbury) and Long Meadow Pond (Bethlehem/Morris) as indicated in the 305b Assessment Results as these are key headwater sources within the Pomperaug Regional Basin.

Response: Thank you for the comment. No changes were made to the final document.

Comment: Table 3-4, page 262 and Table 3-8, page 368: We found there is a discrepancy for segments included in the Impaired Waters List. Segment CT6804-00_01 Weekeepemee River-01 is included on the Impaired Waters List (page 262), while Table 3-8 Reconciliation List of Impaired Waters (Delistings and Listings) on page 368 indicates that this segment should be delisted. The discrepancy is that the other two Pomperaug Basin segments included on page 368 (CT6800-00_01 and CT 6800- 00_03) which indicate Delisting were not included in the Impaired Waters List. Based on this approach, it seems that CT6804-00_01 Weekeepemee River-01 should not be included on the impaired waters list.

Response: Segment CT6804-00_01 Weekeepemee River-01 was delisted in this reporting cycle because a TMDL was approved by EPA in 2012. The Department has made the revision in the final document to remove the segment from Table 3-4 as noted.

Comment: Table 3-5, pages 321-322: We feel that it would be helpful to IWQR readers to include the Segment ID Number or at least the related segment designation in the “Waterbody Name” column of Table 3-5 to alleviate any confusion that may occur in reading this table.

Response: The Department has made the revisions to the table to include the segment ID in the final document.

Comment: Two segments in the Pomperaug Regional Basin (CT6800-02_01 South Brook-01 and CT6800-03_01 Stiles Brook-01) are indicated as “Not Supporting” for Aquatic Life in Table 2-4 (page 131). They are also included in Table 3-7 Nonpollutant Impairments (EPA Category 4c). We are concerned that while they are included in this list of impairments there is a significant lack of guidance or prioritization related to the management measures required to meet the applicable water quality standards (as described this category is described on page 229).

Response: In some cases of impaired waters, a TMDL may not be an appropriate tool for restoration measures. Waters in Category 4c often present challenges to identifying and implementing appropriate mitigation measures to affect change within the water body. Management measures may be taken on a case by case basis where appropriate while others benefit from a broader state wide approach. The work that DEEP and stakeholders are engaged in to address stream flow concerns within the state is a prime example of such an effort. Management plans for addressing 4c related impairments are most appropriately found within documents pertaining such case-by-case or statewide efforts. DEEP will evaluate potential future tools to better communicate to the public information pertaining to impaired waters, including water quality trends and analyses and actions to address documented impairments. No changes were made to the final document.

Comment: We feel that CT6800-02_01 South Brook-01 can be removed from this list as natural geologic conditions are the cause of this impairment. This segment was documented as “losing reach” of river by the United States Geological Survey in its 2007 investigation titled Simulations of Ground-Water Flow and Residence Time near Woodbury, Connecticut. A copy of this report is available online at: http://pubs.usgs.gov/sir/2007/5210/pdf/report_1-28-08_508.pdf with attention directed to page 25.

Response: The Department agrees that based on the USGS Report provided that CT6800-02_01 South Brook-01 should be omitted from category 4C since this is a natural geological condition and there are no known diversions that impact South Brook. The Department has revised the appropriate tables to reflect removing the impairment in the final document.

Comment: We are pleased that CT6806-00_02 Transylvania Brook (Southbury)-02 has been recommended for delisting from the Impaired Waters List based on new bacteria data that meets the Water Quality Standards for recreation. Also, Table 3-9, page 391: Acknowledging the listing CT6806-00_01 Transylvania Brook (Southbury)-01, we agree that it should be prioritized for a TMDL for bacteria. This will allow for more detailed potential source information and management strategies.

Response: Thank you for the comment of support. No changes were made to the final document.

Comment: Table 3-8, page 377: We acknowledge that new bacteria data has revealed the need to list CT6806-00_01 Transylvania Brook (Southbury)-01 for Recreation as included in Table 3-8 Reconciliation List of Impaired Waters. Based on the discrepancies noted in item #5 (above), it seems that this segment should be included in Table 3-4 Impaired Waters List (Category 5) on page 262.

Response: The Department has made the revisions to Table 3-4 in the final document to include the segment.

Comment: We feel that the stream segments that do not meet the designated water quality standards need to stay on the Impaired Waters List even when a TMDL has been approved. An approved TMDL does not automatically improve the stream quality to a point where it is actively meeting the water quality standards. We feel that a segment should only be delisted from the Impaired Waters List when it actually meets the water quality standard. Until that time, we feel, it should remain on the impaired waters list. Removing it gives the misconception that the problem no longer exists.

Response: When a TMDL or other management measure is established for an impaired water, the waterbody is assigned to the EPA Category 4 (4a, 4b, or 4c). The waterbody is delisted from the Section 303d Impaired Waters List, but it still remains impaired in Category 4 until a future assessment confirms the designated use is Fully Supporting. This category process was established by EPA for identifying and tracking the status of the nation's water quality. The Department will continue to look for ways to improve our communication of the IWQR for future listing cycles. No changes were made to the final document.

Comment: Comments with regard to report format. As a public document that most will access online, and potentially print sections pertinent to their watershed, it would be helpful to the user to match the page numbers in the PDF with those printed on the page so that when a user prints page 390, for example, they are entering page 390 in the print cue. Tables 3-7 and 3-8, pages 344-378: Note that there are some page formatting concerns with the placement of the page numbers.

Response: Thank you for the suggestions. The Department will continue to look for ways to improve our communication on the IWQR for future listing cycles. No changes were made to the final document.

Resident of New Haven, Martha Smith

Comment: Referring to page 118 and river segment CT5305-00_01, West River (New Haven/Woodbridge)-01, description in Table 2-4, DEEP should re-evaluate the location description to eliminate reference to tide gates which do not exist. Recommend “From Chapel Street crossing (just DS of Edgewood Park Pond), New Haven, US to Konolds Pond outlet dam (just US of Bradley Road crossing), Woodbridge.”

Response: The Department will change the description to “Chapel Street crossing (just DS of Edgewood Park Pond), New Haven, US to Konolds Pond outlet dam (just US of Bradley Road crossing), Woodbridge” as suggested. We will continue to evaluate our estuarine assessment methodology and make changes to descriptions as appropriate. There was no change to the assessment due to this typographical error.

Comment: River segments need to be adjusted to account for rising sea levels as saline water rises higher in the stream systems than it previously did .

Response: The Department will continue to evaluate river segments in the future and will re classify the water quality classification if necessary based on the best available data. No changes were made to the final document.

Clean Up Sound and Harbors (CUSH), Claire Gavin

Comment: CUSH (Clean Up Sound and Harbors) would like clarification on criteria, sampling frequency, and interpretation of data for dissolved oxygen in coastal bays.

Response: On October 10, 2013, the Connecticut Water Quality Standards Regulations Sections 22a-426-1 to 22a-426-9, inclusive, of the Regulations of Connecticut State Agencies, became effective. Dissolved oxygen criteria were adopted which include acute and chronic criteria. The acute criteria states that the concentration of dissolved oxygen shall not be less than 3.0 mg/L. In nearshore waters (landward of the 5 m depth contour) available data are generally evaluated against this criterion. The Department looks forward to discussion with CUSH on these important topics. No changes were made to the final document.

Comment: Pequotsepos Cove, a small cove, less than a mile long, that emerges from Inner Mystic Harbor north of Mason's Island, is not mentioned either in this draft or in the 2012 report. This is an important waterbody where residents of this area are known to collect crabs and possibly shellfish in the cove.

Response: The Department agrees and will add Pequotsepos Cove as a new segment CT-E1_033. Since this is an area of interest to DEEP as well as CUSH, we encourage future discussion and the possibility for us to collaborate our monitoring efforts.

Comment: Mystic Inner Harbor (E1_008) is listed as fully supportive of aquatic life (p.185). However, in flood-tide Pequotsepos samples, which include a component from Fishers Island Sound as well as from north of Mason's Island, 2013 summer average dissolved oxygen was 4.3 ppm (range 3.8-5.9, N = 7). DO levels are consistently below those in ebb-tide samples from the mid-town Mystic River.

Response: Thank you for offering these dissolved oxygen data from Mystic Harbor. In our assessment of Segment CT-E1_008-SB which includes Murphy's Point and Mason Island area, we did not see dissolved oxygen values below the 3.0 mg/l acute criterion. Your summer 2013 data supports our findings. Therefore, the segment is assessed as fully supporting aquatic life. We continue to look for opportunities to enhance our assessments of estuarine water and we encourage future discussion on your program at CUSH and the possibility for us to collaborate our monitoring efforts. No changes were made to the final document.

Comment: Wequetequock Cove (E1_003) is listed as having insufficient information to assess suitability for aquatic life. This cove has the worst water quality of any area we monitor, with high nutrient levels as well as low dissolved oxygen. In all monitored years (2009-2013), average summer dissolved oxygen in biweekly samples was consistently below 4.8 ppm, and in 2012-2013, 20% of ebb-tide samples were below 3.0 ppm. So far this summer, ebb-tide dissolved oxygen in July and August (4 samples) has averaged 2.4 ppm at the head of the cove near Rte 1, and 3.8 ppm further south, off Saltwater Farms Vineyard.

Response: Thank you for offering these dissolved oxygen data from Wequetequock Cove. Wequetequock Cove is very shallow cove with little tidal flushing. At this point, the Department does not have enough information to make a formal assessment. We will highlight this area for a formal assessment for the next reporting cycle and we encourage future discussion on your program at CUSH and the possibility for us to collaborate our monitoring efforts. No changes were made to the final document.

Rivers Alliance of Connecticut, Margaret Miner

Comment: The following text should be explained; "Water quality in Connecticut has improved over the last few decades as a result of protective laws, remediation efforts and a substantial investment in improved wastewater treatment. For example, the latest statewide assessment showed that 77% of the wadeable streams in Connecticut are healthy and meet aquatic life use support goals. Although difficult to compare with historic data, it is appropriate to point out that the percentage of streams meeting aquatic life goals during the late 1970's and early 1980's was much lower". It would also be helpful if DEEP would give the number based on the previous methodology, prior to GRTS use (page 15).

Response: The Department has seen drastic improvements in water quality from the 1970's and 1980's to current conditions through implementing state policies and the Federal Clean Water Act policies. One way of taking the pulse of waters is to provide a statistical answer such as those provided in probabilistic surveys. The latest statewide assessment for aquatic life shows 77% of the wadeable streams are healthy and meeting aquatic life goals. Unfortunately, statistical surveys using Generalized Random Tessellation Stratified (GRTS) design were not

completed in the 1970's and 1980's for comparison, but this is something we can do in for future reports. No changes were made to the final document.

Comment: Data tiers standards should include triggers for moving a water body onto or out of the impaired-water category.

Response: The Department uses the procedures outlined in the Chapter 1, Consolidated Assessment and Listing Methodology, to move waters out of the impaired water category and this process requires the approval of EPA. The data tiers are intended to give the public a sense of the different types of data and data quality and how the Department uses these data types for the assessment process. No changes were made to the final document.

Comment: DEEP should revive the "threatened" water category. The purpose of the CWA is to maximize water quality consistent with designated uses. Special, transparent attention should be given to waters that are improving or in danger of regressing. Speeding improvement and retarding regression should be encouraged so as to meet CWA goals.

Response: The Department recognizes the importance of highlighting more refined categories of designated use attainment and is working on implementing BCG tiers that will help in this regard (also see response to CRWC above). Our goal is to report tiers for the 2016 IWQR. No changes were made to the final document.

Comment: The recognition that flow impairments are under-represented in the report strongly indicates that DEEP should do more to analyze and report flow problems. The IWQR should include data used in the stream classifications developed pursuant to the flow regulation. If this cannot be done in the report, it should be added as an appendix and referenced in the body of the report wherever appropriate.

Response: The Department is in the process of adopting streamflow classes pursuant to the Regulations of Connecticut State Agencies Section 26-141a and b. No formal adoption is completed as of this date. For the next IWQR assessment cycle, the stream flow classification can be considered as part of the assessment process. No changes were made to the final document.

Comment: There is an emphasis on wadeable streams (p. 45) in the report and in DEEP's phosphorus negotiations. Probabilistic projects can be defined for reliability. But how is DEEP accounting for the state's important nonwadeable streams?

Response: The Department has a long history of assessing wadeable streams and has a mature program that evaluates across many lines of evidence to make assessments. These data include biological evaluations using macroinvertebrates, fish surveys, and periphyton; chemical evaluations; toxicity data; permittee monitoring; and any other reliable source of information. Non wadeable stream assessments are conducted by using available data such as those collected by the Department, USGS, Non- Governmental Organizations, Federal Agencies and any other reliable source of information. No changes were made to the final document.

Comment: No river should be put into a category such as 4c in which no hope is offered. Why is channelization accepted as a permanent fate? Sometimes rivers are brought back to the sunshine. Sometimes dams are removed. Even if no action is contemplated in the immediate future, the nature of the problem and nature of a positive change should be described.

Response: EPA Category 4c represents segments that are impaired for a designated use in which the cause is identified as a non-pollutant. Category 4C acknowledges that conditions such as stream channelization exist in Connecticut and that these conditions can influence the aquatic life such that designated uses are not attained. DEEP can work to address non-pollutant stressors to effect a change in the waterbody condition. The Department does not view these impairments as permanent and has the ability to move the water to another category every 2 years during the assessment cycle if data are collected to support a category change. No changes were made to the final document.

APPENDIX A. Original Comments on the 2014 draft Integrated Water Quality Report.