

From: DOUGLAS SMITH [mailto:dsmith0705@sbcglobal.net]

Sent: Tuesday, July 14, 2009 11:10 AM

Subject: water quality comments

Dear Mr. Hust,

This memo is in response to a plea from Rivers Alliance to seek comments for water quality standards:

The University of New Hampshire studies show that hydrodynamic separators do not remove the promised 80% of TSS in stormwater runoff, except in ideal laboratory conditions. Field studies show a TSS removal rate of 10-30%, instead. Hydrodynamic separators are useful for pretreatment only. Please ensure that BMP guidelines are field tested and actually deliver the expected results.

"Home Rule" does not work in Groton, where the Water Resource Protection District is regulated by a town that favors development. Groton's WRDP regulations are basically silent on guidelines and mandates to ensure water protection. A site plan application for a big box store next to Hempstead Brook and Groton's terminal reservoir was denied by the Planning Commission, only after citizen interveners provided the needed scientific and engineering data. The WRPD regulations are silent on hazardous substances, and 70% impervious surface coverage is allowed. Stiffer State regulations regarding impervious coverage, buffers, chemical use and stormwater treatment are needed, following the pattern of success seen with the Inland Wetlands Agency's enabling language. It is better to place the burden of proof for water quality protection on the developer than on volunteer commissioners, constrained by inadequate language and a pro-development administration.

Thank-you for your time and interest in protecting our water quality

Joan Smith, President Pro Tem
Groton Open Space Association
58 Mohegan Rd.
Groton CT 06340
860 536-9811