

TO: Traci Iott, CT DEP  
FROM: Margaret Miner, Rivers Alliance of CT  
RE: Review of CT Water Quality Standards/ Phosphorus Reduction Strategy

July 31, 2009

Dear Ms. Iott:

*Rivers Alliance is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship.*

Thank you for the extended deadline to submit comments on the Triennial Review of CT Water Quality Standards, including CT DEP's proposed phosphorus reduction strategy.

Rivers Alliance of Connecticut has consulted with Roger Reynolds of CT Fund for the Environment/Save the Sound. We support his comments in his submission of July 16, 2009. In particular, we feel that the approach and standards given in The Connecticut Methodology for Freshwater Nutrient Management Technical Support Document will not yield the reductions in phosphorus loading in surface waters appropriate under the Clean Water Act. We lean toward a results-based approach, with specific numerical standards for phosphorus.

We do recognize valuable aspects of the DEP proposal, and believe that it might be possible to work out a successful hybrid strategy that would combine features from DEP's present approach with features from a more traditional approach with good results. But the document as written sets a standard for phosphorus loading that we believe is, in general, not sufficiently protective.

As I mentioned in my earlier submission by email on the revision of the Water Quality Standards, we feel that the DEP should reconsider its interdependent definitions of "natural" conditions and "Best Management Practices." Taken together, these definitions redefine "natural" to mean "as natural as one can manage without spending too much money." With this reasoning, harmful levels of phosphorus can be defended as natural. A distinction between what is natural and what is presently attainable would be more useful.

We also have read, circulated, and support the comments of Richard Weisberg submitted in connection with the Triennial Review of the Water Quality Standards. His data and recommendations with respect to temperature and nutrients in stream and rivers are, to my knowledge, consistent with the best science on aquatic health. As waters warm, the harmful effects of nutrients spike. Richard Harris, of Harbor Watch/ River Watch recommends that phosphorus-reduction should be used year round, and we agree.

In the future, we look forward to more consideration of beneficial re-use of the phosphorus taken up in alum and buried.

We know that the DEP takes very seriously the problem of phosphorus loading in Connecticut. But possibly we have all underestimated the impact of relatively small quantities in surface waters. I quote here from the EPA OWOW site <http://www.epa.gov/volunteer/stream/vms56.html>

## **“5.6 Phosphorus**

### ***Why is phosphorus important?***

Both phosphorus and nitrogen are essential nutrients for the plants and animals that make up the aquatic food web. Since phosphorus is the nutrient in short supply in most fresh waters, even a modest increase in phosphorus can, under the right conditions, set off a whole chain of undesirable events in a stream including accelerated plant growth, algae blooms, low dissolved oxygen, and the death of certain fish, invertebrates, and other aquatic animals.” (emphasis added)

.....

### **“Monitoring phosphorus**

Monitoring phosphorus is challenging because it involves measuring very low concentrations down to 0.01 milligram per liter (mg/L) or even lower. Even such very low concentrations of phosphorus can have a dramatic impact on streams. Less sensitive methods should be used only to identify serious problem areas. (emphasis added)

Our rivers and streams are becoming warmer, flashier, and more laden with nutrients. We urge you to be stricter in regulating phosphorus reduction.

Sincerely,

Margaret Miner, Executive Director