**Housatonic Valley Association**

150 Kent Road
P.O. Box 28
Cornwall Bridge, CT 06754
860-672-6678

**hvatoday.org**

Merwin House
14 Main Street
P.O. Box 496
Stockbridge, MA 01262
413-298-7024

37 Furnace Bank Road
P.O. Box 315
Wassaic, NY 12592
845-442-1039

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Ms. Corinne Fitting
Department of Energy & Environmental Protection
Bureau of Water Protection and Land Reuse
79 Elm Street
Hartford, Connecticut 06106-5127

Dear Corinne,

The Housatonic Valley Association (HVA) is grateful for the opportunity to submit these comments on the proposed Streamflow Classifications for the Housatonic River watershed in Connecticut. Free-flowing streams are essential to the long-term conservation of the Housatonic Watershed's natural heritage as the distribution of terrestrial and aquatic habitats shifts with the changing climate. In addition to the protection and restoration of stream corridors, a cornerstone of HVA's Watershed Conservation strategy is strategic removal of dams and barrier culverts to restore free-flowing waters in Housatonic sub-watersheds known to support important species and habitats. In general, we are pleased to see that the many of the streams targeted by HVA and our partners for protection and restoration of free-flowing status have been listed as Free Flowing under these proposed classifications.

We have some general comments related to how we can work together with CT-DEEP in the future to update classifications towards Free-Flowing as Hydrologic Stressor Factors are mitigated, and specific comments related the allocation of Decreasers in sub-watersheds where HVA and our partners are actively working.

<u>Hydrologic Stressor Factors</u>

*4) Size and locations of dams*

HVA and our partners across the Housatonic watershed, including CT-DEEP, are actively working to remove or otherwise mitigate streamflow and habitat continuity issues at obsolete dams (especially obsolete high-hazard dams). We look forward to working with CT-DEEP to reassess this hydrologic stressor factor on stream segments where these kinds of projects are implemented.

*6) Existing development and Impervious Cover in the upstream watershed*

CT-DEEP, HVA and other conservation non-profits, CT Municipalities, and a wide variety of other actors are working to reduce the impact of Impervious Cover (IC) on surface water by disconnecting IC from traditional stormwater conveyance systems. These practices, referred to as Low Impact Development or Green Infrastructure, restore and protect natural flow regimes in addition to reducing pollution.

Disconnecting IC from surface water is happening through a variety of initiatives in CT, including but not limited to watershed-based planning and implementation, the Municipal Separate Storm Sewer System (MS4) permit program, and the establishment of Impervious Cover Total Maximum Daily Loads. All of these entail mapping IC at a finer scale than the 2006 NLCD IC dataset, and differentiating between IC that is directly connected to surface waters and IC that isn't in order to track the progress of disconnection. As better information becomes available for segments whose classification was influenced by upstream IC, and as disconnection projects are implemented, we look forward to working together with CT-DEEP to update streamflow classifications towards Free Flowing wherever possible.

Additional Factors

*8) Available data on species that are dependent upon stream and riparian habitat.*

8.1) The classification process defined stream segments where high densities of wild brook trout (> 73 wild brook trout/ hectare) have been sampled as deserving of this Decreaser. While the presence of Brook Trout is an excellent indicator of the presence of persistent high-quality cold water aquatic habitat, there are a number of other species of conservation concern that also depend on free-flowing streams and healthy riparian habitat for their survival. The distribution of these species may or may not overlap with the distribution of Brook Trout. A good example of this is the Wood Turtle, which along with the Brook Trout is listed in The CT Comprehensive Wildlife Conservation Strategy as a Species of Greatest Conservation Need in the focal habitat of Unrestricted, Free Flowing Streams. HVA is working with local partners on a project to restore eroding streambanks along the Pootatuck River in the Town of Newtown (segment 103,016,244). We know from detailed assessments along the project reach that while there are not Brook Trout in this segment, there are Wood Turtles using the banks for overwintering and the riparian areas for nesting and feeding. This segment was not given the Dependent Species Decreaser, and was classified as Minimally Altered.

We understand the need to make the process for initial classification as simple as possible in order to efficiently classify a large number of stream segments, but we hope that in the future we can work together to reassess these initial classifications based on the presence of other Free-Flowing obligate species in addition to Brook Trout. The addition of even just one or two additional indicator species could help to identify stream segments important to a broader range of Free-Flowing obligate species, and worthy of this Decreaser. HVA would be happy to assist CT-DEEP with this analysis.

8.2) Decreaser # 9 is given to segments where active restoration of anadromous fish runs is occurring, and those segments **targeted for restoration** of anadromous fish runs in addition to segments already used by anadromous fish. HVA and our partners have targeted several sub-watersheds of the Housatonic that are healthy, support important species and habitats, and are thought to be particularly resilient to the effects of climate change for the protection **and restoration** of Eastern Brook Trout populations. In these areas, HVA and our partners have deployed or plan to deploy significant resources for projects such as dam removal, culvert replacement, stream corridor restoration, and IC disconnection that will protect existing EBT populations, and allow their expansion into areas where they had been extirpated. An excellent example of this is the Salmon Kill watershed in Sharon and Salisbury. Led by Trout Unlimited, restoration of instream and riparian habitat along the mainstem Salmon Kill in the past four

years has enabled repopulation by EBT along many reaches. The reaches where restoration is actively occurring include the following segments along the mainstem Salmon Kill:

103,004,077; 103,004,227; 103,001,157; 103,001,117; 103,003,939; 103,001,056; 103,003,919

HVA and our partners are also conducting watershed-scale planning to identify and implement restoration projects in the sub-watersheds of the Housatonic in CT listed below (along with segments within them classified as twos or threes), where healthy populations of EBT and other Free-Flowing obligate species can be protected and restored. Given the significant amount of resources committed to their protection and restoration by HVA and our partners, we ask that the Department consider awarding this Decreaser to these segments.

The **Ten Mile River** watershed (segments 103004947; 103005029; 103005030; 103004959; 103005036; 103005779; 103005753; 103005916; 103004149; 103005149; 103004681; 103004691; 103004695; 103004969; 103005034; 103005084; 103005107; 103005137; 103005139; 103005174; 103005557; 103005827; 103005889; 103006013; 103006076; 103006192; 103006220; 103006245; 103006252; 103006308)

The **Shepaug River** watershed (segments 103009806; 103009920; 103009734; 103009676; 103009683; 103009688; 103009701; 103009834; 103009835; 103010064; 103005911; 103004478; 103005331; 103005336; 103005515; 103005821; 103005851; 103005947; 103005956; 103006033; 103006041; 103006047; 103006053; 103006061; 103006082; 103006085; 103006127; 103006612; 103009208; 103009457; 103006151; 103006154; 103006156; 103006654; 103006190; 103006202; 103007768; 103008128; 103008136; 103008554; 103006700; 103006892; 103006904; 103006910; 103006920; 103006951; 103006963; 103009186; 103009195; 103007030; 103007077; 103007182; 103008102; 103009200; 103009201; 103007135; 103008217; 103008913; 103007531; 103008151; 103008243; 103008349; 103008389; 103008696; 103008737; 103008753; 103010208; 103009723; 103009214; 103009223; 103009441; 103009443; 103009602; 103009649; 103009661; 103009662; 103009673; 103010063; 103010092; 10301037)

**Smaller tributaries draining to the mainstem Housatonic currently under consideration for Wild and Scenic River designation**, running from the MA border to Boardman Bridge in New Milford (segments 103003457; 103003442; 103003390; 103003430; 103005253; 103003940; 103003944; 103005964; 103005968; 103005971; 103005978; 103005255; 103005748; 103005814; 103005835; 103005901; 103005905; 103005919; 103005931; 103005941; 103005943; 103005949; 103006012; 103009387; 103009177; 103009179; 103009189; 103007300; 103009165; 103007268; 103007281; 103007292; 103007299; 103009148; 103009152; 103010449; 103010461; 103010803; 103010809; 103011323; 103011330)

The **Hollenbeck River** watershed (segments 103001171; 103004070; 103001032; 103001091; 103001095; 103001100; 103001109; 103001131; 103001132; 103001138; 103001179; 103001181; 103001184; 103001185; 103001201; 103001203; 103003895; 103003898; 103003899; 103004043; 103004044; 103004127

12) It is our understanding that POSM is not comprehensive for NW CT, and therefore there are segments that might warrant the Protected Lands Decreaser that did not receive it during the

assignment of preliminary streamflow classifications. HVA facilitates the Litchfield Hills Greenprint Collaborative (LHGC), a Regional Conservation Partnership covering 28 towns in the northwest corner of CT. As part of our service to LHGC members, HVA maintains a database of protected lands across the LHGC service area. This database includes both Fee Simple and Eased properties- it is our understanding that POSM does not include easements, which comprise a significant fraction of the protected lands in the LHGC service area – 42,600 acres of the total of 155,600 acres, or approximately 27%. A preliminary analysis conducted by HVA indicates that the following segments classified as twos or threes intersect with eased properties that may not be included in POSM, and could warrant a revision based on consideration of this Decreaser: Segments 103006154; 103006190; 103008554; 103008378; 103009441; 103009443; 103009662; 103001157; 103001171; 103001117; 103001131; 103001138; 103001179; 103001181; 103001201; 103001203; 103003810; 103003829; 103003856; 103003919; 103003977; 103003981; 103004020; 103004227; 103003775; 103003457; 103004070; 103005779; 103001039; 103001209; 103003442; 103004174; 103003430; 103003795; 103003773; 103003889; 103003908; 103004043; 103004044; 103004127; 103005827; 103006792; 103007182; 103008102; 103007135

Once again, we are grateful for the opportunity to provide these comments. Please do not hesitate to contact us if you would like to discuss them in more detail.

Sincerely,

Michael S. Jastremski
Watershed Conservation Director
860-672-6678 ext. 109
MJ.HVA@outlook.com