

From: [RM Lytle](#)
To: [Stone, Chris](#)
Subject: General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
Date: Saturday, February 15, 2020 5:53:52 PM

Christopher Stone, P.E.
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106 5127

Mr. Stone,

I am writing to you in support of Trout Unlimited's (TU) proposed changes to the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. TU's proposed changes will help protect sensitive coldwater ecosystems, including the wild brook trout and wild brown trout that rely on clean cold water for their survival. The addition the amendments that TU and I are in support of are:

Section 2. Definitions

“Coldwater Fish Resource (CFR)” means a waterbody (stream, river, or tributary thereto) with documented populations of wild brown trout (*Salmo trutta*) or wild brook trout (*Salvelinus fontinalis*) as documented by CT DEEP in the last ten (10) years.

Section 5. Conditions of This General Permit

(a) General Conditions

(4) Impacts to Coldwater Fish Resources (CFRs)

A one-hundred (100) foot buffer shall be maintained between any project and a CFR. The buffer shall consist of undisturbed soil and existing vegetation. Fisheries data is available online through the University of Connecticut (UCONN) Connecticut Environmental Conditions Online (CTECO) or by contacting CT DEEP Inland Fisheries.

(b) Stormwater Pollution Control Plan

(2) Stormwater Control Measures

(D) Other Controls

The one-hundred (100) foot buffer adjacent to any CFR must be maintained post-construction and supplemented with additional plantings as necessary to maintain the canopy/stream cove

CFRs are particularly sensitive to landscape modifications in riparian corridors. These include decreases in canopy cover and modifications to coldwater seeps and springs that maintain the

coldwater CFR species require.

The one-hundred (100) foot buffer proposed in Appendix I is a commendable step forward in reducing the impacts of solar projects on wetland, watercourses, and vernal pools. However, the impacts of clearing and development are not limited to solar projects. All development has the potential to impact wetlands, watercourses, and vernal pools. CFRs are particularly sensitive to landscape modifications along riparian corridors and a single development site has the potential to irreversibly change a watercourse. These impacts to CFRs cannot not be mitigated/replicated elsewhere like a wetland or vernal pool. Once the thermal properties of a watercourse are changed (and the species extirpated), it cannot not be reversed.

I am in full support of the CT Council of Trout Unlimited's proposed amendments which they have submitted to you and the Department. CFRs, and the species they support, are increasingly threatened by warming trends and precipitation fluctuations in the Connecticut climate, and require special protections. Thank you for your time.

Sincerely,

Rowan M. Lytle of East Hampton