

From: csullivan@conservect.org
To: [Stone, Chris](#)
Subject: Stormwater General Permit comments
Date: Tuesday, February 18, 2020 12:53:13 PM

Good morning Chris,

I hope all is well for you in Hartford. I wanted to send a few comments that I had on the DRAFT Stormwater General Permit document. I have included some points in the body of this email. Thank you for providing the opportunity to provide input into the drafting of the final document and improving the resulting process for better protection of our natural resources.

Comments follow:

- Section 5(a)(3) Toxicity to Aquatic and Marine life, this section needs to clearly state that the Permittee shall pay for the toxicity testing to be sure there is no harm to the receiving waters as is mandated in the text of the permit.
- There are a few locations in the permit where a URL is included and it doesn't appear to be hyperlinked via underlined text [ie (Section 5(b)(1)(B)(vi)(b) "At minimum such checklists, "
- Section 5(b)(2)(A)(iii) Suggest to insert the word "covering" between "conditions" and "all" in the first sentence. This clause is unclearly written as it stands in the proposed text

- Section 5(b)(2)(C)(i)(a) close to the end of this section (7th line from the end) "If retention of the half...describing" Suggest to STRIKE "the" in front of the word half.
- Section 5(b)(3)(A) "no more than 3 acres may be disturbed." This is stronger language than non-impaired waters text earlier in proposed document. I would encourage this more protective standard for all waters (not just impaired ones) that receive direct discharges from construction activities.
- Section 5(b)(9)(B) the completed registration form for the general permit shall be submitted to the listed municipal and water company entities as Standard Procedure. It isn't clear how these entities would be aware of a submitted registration form in order to know to request this information. I would suggest to strike the words "upon request"
- The remaining comments are for the MOA, which was agreed upon when I wasn't in my current role. It is my understanding that there may be a follow up meeting with the Districts for additional discussion on this piece but I did want to submit a few comments here:
 - o Appendix E (II)(A)(1) I do not believe that I need nor do I want two hard copies of the submitted SWPCP. One hard copy and the e-copy are sufficient in my opinion.
 - o Appendix E(II)(B)(1) District meeting 30 calendar days after submission to issue review and determination. I would suggest changing calendar days to work days for deadline.
 - o Appendix E(V)(B) Contact info for SWCD is inaccurate. We no longer utilize a fax number and our phone is 203-859-7014. Email is csullivan@conservect.org . This contact information needs to be updated in every section of the permit and appendices.

Thank you again for the opportunity to provide input on this process. I look forward to collaboratively working with you to be sure that we are protecting Connecticut's natural resources and waterways.

Sincerely
Chris
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