



**Wood-Pawcatuck Wild and Scenic Rivers  
Stewardship Council**  
PO Box 601 Westerly, RI 02891

Jane Sawyers  
RI Department of Environmental Management Offices  
235 Promenade Street  
Providence, RI 02906  
[jane.sawyers@dem.ri.gov](mailto:jane.sawyers@dem.ri.gov)

Re: Proposed Amendments to Surface Water Quality Rules (250-RICR-150-05-1)

Dear Ms. Jane Sawyers,

The Wood-Pawcatuck Wild and Scenic Rivers Stewardship Council (Stewardship Council) submits the following comments regarding the proposed changes to the DEM Surface Water Quality Regulations.

In 2019 Congress designated the seven rivers and associated tributaries of the Wood-Pawcatuck Watershed as part of the National Wild and Scenic Rivers System. The purpose of this prestigious designation is to preserve the free-flowing character of the rivers and to protect and enhance the outstandingly remarkable values of the designated rivers, for the enjoyment of present and future generations.

The Stewardship Council is the body charged with implementing strategies to maintain and enhance these values. We are composed of representatives of the 12 towns in the watershed and nonprofit and agency partners, including RIDEM, Connecticut DEEP, Save the Bay, Wood-Pawcatuck Watershed Association, Westerly Land Trust, The Nature Conservancy, and Avalonia Land Conservancy.

Monitoring and improving water quality is key to our efforts. We have funded water quality monitoring in the watershed, and have been active in attempting to shape development proposals in the area so as to minimize any impacts on water quality.

The proposed amendments provide additional protection for segments of the Wood-Pawcatuck Wild and Scenic Rivers. We endorse these changes, and applaud RIDEM for recognizing the importance of additional antidegradation protection. We also endorse the adoption of site specific metals criteria for specific river segments of the Pawcatuck River where additional focused water quality monitoring and analysis has been performed.

We note that there is one segment of the Pawcatuck River that does not qualify for the additional protection, apparently due to active litigation. We anticipate that this segment will qualify for such protection once this concern is lifted.

We look forward to working with RIDEM on protections for these invaluable Wild and Scenic Rivers in the future.

Sincerely,

A handwritten signature in black ink that reads "Antonia Bryson". The signature is fluid and cursive, with the first name "Antonia" and the last name "Bryson" clearly distinguishable.

Antonia Bryson  
Chair, Wood-Pawcatuck Wild and Scenic Rivers Stewardship Council