

THE COUNTY OF CHESTER

CHESTER COUNTY
WATER RESOURCES AUTHORITY
Government Services Center • Suite 260
601 Westtown Road
P.O. Box 2747
West Chester, PA 19380-0990



COMMISSIONERS
Carol Aichele
Terence Farrell
Kathi Cozzone

Denis Newbold, Chairman
Janet L. Bowers, P.G., Executive Director

Telephone: (610) 344-5400
Fax: (610) 344-5401

October 27, 2010

Mr. Arthur Coccodrilli
Independent Regulatory Review Commission
333 Market Street,
14th Floor,
Harrisburg, PA 17101

RE: Beaver Run/ French Creek Upgrade, IRRC No. 2872, Reg. No. 7-461

Dear Mr. Coccodrilli:

The Chester County Water Resources Authority (CCWRA) hereby expresses our strong support for the upgrade of French Creek and the Beaver Run from a "High Quality" designation to the designation of "Exceptional Value" and we strongly encourage the members of the Independent Regulatory Review Commission to approve the recommendations presented by the Environmental Quality Board (EQB) and the PA Department of Environmental Protection (PADEP).

CCWRA has supported this upgrade in status since the effort began in 2003 to pursue the Exceptional Value designation. This upgrade in stream designation is consistent with and will help implement "*Watersheds – An Integrated Water Resources Management Plan for Chester County and Its Watersheds*" – which is the water resources component of Chester County's comprehensive plan *Landscapes2*. Specifically, the upgrade of these stream reaches to Exceptional Value will directly support implementation of the following goals and objectives from the County's "*Watersheds*" Plan –

Goals:

- Goal 3 - Preserve natural resources
- Goal 4 - Improve water quality
- Goal 5 - Reduce stormwater runoff and flooding
- Goal 6 - Protect watershed water balances.

Objectives:

- Objective 3-4 – "Protect and enhance streams supporting "sensitive resources" [including EV waters] to recognize their vulnerability to low stream flows and water quality improvements"
- Objective 4-2 – Where supported by stream conditions and uses, petition for upgrades in state stream designations.
- Objective 4-6 – Remove pollutants from stormwater discharges prior to release to waterways.
- Objective 4-7 - Reduce pollutant loadings from point source discharges.

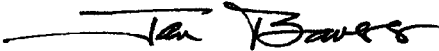
RECEIVED
IRRC
2010 OCT 27 P 3:34

French Creek watershed provides immeasurable environmental and economic benefits to Chester County and its communities as it attracts significant eco-tourism and outdoor enthusiasts to experience and enjoy its natural resources. Over the course of the last 6 years since this petition was filed, the Department has done an exhaustive analysis of the conditions in French Creek and Beaver Run and have come to the conclusion that the Beaver Run and the main stem of French Creek from the confluence of the Beaver Run downstream to the Kennedy Covered Bridge should receive the designation of "Exceptional Value".

We strongly encourage you to support the recommendation of PADEP, and the analytical results of their investigations, as well as the recommendation of the EQB by approving this upgrade in designation.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet Bowers". The signature is written in a cursive style with a horizontal line extending to the left.

Janet L. Bowers, P.G.
Executive Director

Cooper, Kathy

2872

From: Bowers, Janet L. [jbowers@chesco.org]
Sent: Wednesday, October 27, 2010 2:48 PM
To: IRRC
Subject: CCWRA comments regarding IRRC No 2872 Reg No 7-461
Attachments: FrenchCr EV Upgrade 10_28_10 CCWRA.pdf

Please accept the attached letter of comments from the Chester County Water Resources Authority in support of the upgrade to Exceptional Value designation for French Creek. A hard copy of the letter will follow via regular mail.

Thank you.
Jan Bowers

Chester County Water Resources Authority

*Jan Bowers, P.G.
Executive Director
601 Westtown Road, Suite 260
P.O. Box 2747
West Chester, PA 19380-0990
610-344-5400 ph
610-344-5401 fax
chesco.org/water*

RECEIVED
IRRC
2010 OCT 27 P 3:34

This County of Chester e-mail message, including any attachments, is intended for the sole use of the individual(s) and entity(ies) to whom it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended addressee, nor authorized to receive for the intended addressee, you are hereby notified that you may not use, copy, disclose or distribute to anyone this e-mail message including any attachments, or any information contained in this e-mail message including any attachments. If you have received this e-mail message in error, please immediately notify the sender by reply e-mail and delete the message. Thank you very much.