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Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, September 14, 2021 2:57 PM
To: Environment-Committee@pasenate.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; gking; lversen, Sarah A.; Emily.Eyster; IRRRC
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Water Quality Standards - Dunbar Creek et al. Stream Redesignations (#7-557)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Water Quality Standards - Dunbar Creek et al. Stream Redesignations (#7-557).

Commenter Information:

Abigail Jones
PennFuture (jones@pennfuture.org)
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2021 SEP 14 P 3:02
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IRRC

Comments entered:

Brodhead Watershed Association and PennFuture's comments in support of the redesignation of 10.25 stream miles of Cranberry Creek in Monroe County to Exceptional Value (attached).

These links provide access to the attachments provided as part of this comment.

Comments Attachment: [2021 09 14 PF-BWA Comments Cranberry Redesignation.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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September 14, 2021

Submitted via Email

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477
RcgComments@pa.gov

**Re: Support for Redesignation for Cranberry Creek, Monroe County
Part of the Dunbar et. al. Stream Redesignation Proposed Rulemaking
51 Pa.B. 4062 (July 31, 2021)**

Dear Environmental Quality Board,

On behalf of Brodhead Watershed Association (“BWA”) and Citizens for Pennsylvania’s Future (“PennFuture”), please accept these comments in support the proposed Water Quality Standards redesignation rulemaking bundle, Dunbar et. al., which includes the redesignation of Cranberry Creek in Monroe County from HQ to EV. 51 Pa.B. 4062 (July 31, 2021). Our water resources are essential to Pennsylvanians’ health and economic well-being, and it is particularly important to identify and provide heightened protection for waters that meet the criteria for the Commonwealth’s highest classification of EV. While we support all the upgrades proposed in this bundle, we are writing to clearly express our support for the upgrade of Cranberry Creek.

BWA is an educational non-profit organization founded in 1989 to promote and protect clean and abundant water throughout the Brodhead Creek Watershed in Monroe County, PA. BWA assists municipalities, residents/landowners, businesses, and related groups with protecting watershed natural resources through the use of diverse educational modalities and public outreach programs. Programs include online webinars, public workshops, seminars, and hands-on citizen science baseline data collection. BWA is the petitioner for the redesignation of Cranberry Creek which is part of the proposed Water Quality Standards rulemaking bundle.

PennFuture is a member-supported, non-profit public interest organization dedicated to leading the transition to a clean energy economy in Pennsylvania and beyond. PennFuture strives

to protect our air, water and land, and to empower citizens to build sustainable communities for future generations. A major focus of PennFuture's work is to improve and protect water resources and water quality across Pennsylvania, especially in the upper Delaware River Basin, through public outreach and education, advocacy, and litigation. PennFuture firmly believes, as Pennsylvania's Clean Streams Law states, that "the prevention and elimination of water pollution is . . . directly related to the economic future of the Commonwealth," and that "clean, unpolluted streams are absolutely essential" for Pennsylvania to attract new business enterprises, to develop its full share of the tourist industry, and to ensure that Pennsylvanians have adequate outdoor recreational spaces. 35 P.S. §§ 691.4(1), (2), (4).

BWA and PennFuture submitted comments on August 13, 2018, supporting the PA Department of Environmental Protection's ("DEP") draft stream redesignation evaluation report. In 2012, BWA submitted to the EQB a petition to amend the Chapter 93 water quality standards regulations to change the designated use of the Cranberry Creek basin to Exceptional Value ("EV") from its current designation of High Quality—Cold Water Fishes ("HQ-CWF") ("Cranberry Creek Redesignation Petition"). Those comments noted while we were disappointed that the entirety of the Cranberry Creek Basin was not recommended for EV status as was petitioned for, we are nevertheless in support of DEP's analysis and its recommendation that 10.25 stream miles, or about 77% of the overall 13.32 miles of streams in the Cranberry Creek Basin, would be upgraded to EV.

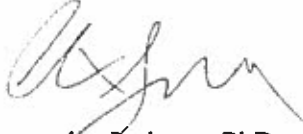
DEP's independent and objective scientific data and analysis reveals that the majority of the Cranberry Creek basin is among the best of Pennsylvania's natural waters. As the Cranberry Creek Redesignation Petition points out, Cranberry Creek supports a healthy wild trout fishery, which may be critical for sustaining trout populations in downstream waters through recruitment. The numerous privately and publicly-owned protected lands, hunting and fishing clubs, and private residences along Cranberry Creek will also benefit from the EV protections. Cranberry Creek is also an indirect tributary to the Brodhead Creek, on which the Brodhead Regional Water Authority operates the largest public drinking water supply in the region. Affording the majority of the Cranberry Creek basin with the highest water quality protections will positively impact the water quality downstream upon which the community relies for its drinking water. Thus, the increased protection of these waters as EV is critical not only to the health of the Cranberry, but also to water quality in the downstream waters, including the Paradise and Brodhead Creeks.

Designating the proposed 10.25 miles of the Cranberry Creek basin as EV will provide these waters with an additional layer of protection to ensure that they continue to serve as a viable habitat for aquatic life and as a bastion for some of the best wild trout fishing in the Commonwealth. We ask that you promptly finalize the water quality standards bundle in order to provide these special waters with the protection they so richly deserve. Providing proper

water quality designations for our waters is one important way to help ensure Pennsylvanians' constitutional right to "pure water" is protected. Pa. Const. art. I, § 27.

Thank you for your consideration of these comments.

Respectfully submitted,



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