



Pennsylvania Council
Trout Unlimited
P.O. Box 5148
Bellefonte, PA 16823
www.patrou.org



September 14, 2021

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Water Quality Standards – Dunbar Creek et al. Stream Redesignations

To Whom It May Concern:

Trout Unlimited is the largest coldwater conservation organization in the Commonwealth, representing over 17,000 members statewide. PATU is writing today with comments related to proposed changes to stream designations for waters in the Dunbar Creek Watershed (Fayette County). These stream designations propose the upgrade of 47.5 miles of stream to exceptional value (EV) use status and the delisting of 1.2 miles of streams from the Section 303(d) list of impaired waters, including several waters in State Game Lands 51. PATU supports these proposed changes in use designations throughout the watershed.

However, PATU does have comments related to the listing of 4.7 miles of stream in the UNT 38212 Glade Run Basin on the Section 303(d) list of impaired waters. PATU observes that the biological data used to support the listing of these miles were collected in 2006, 15 years ago. Additional water quality data were collected in 2016 but benthic macroinvertebrate samples were not collected at this time. The Chestnut Ridge Chapter of Trout Unlimited and partners have been active in the watershed in abandoned mine drainage treatment. It is disheartening to see that one of the results of this report is a net increase in miles considered impaired in the watershed despite these reclamation activities. Basing management decisions on water chemistry data alone without collecting synchronous benthic macroinvertebrate data in a watershed where active reclamation is ongoing does not allow for accurate characterization of impairment status. There are examples of streams (Swatara Creek in Schuylkill County) where biological conditions are being attained, especially those related to fish communities, in spite of water quality parameter exceedances. Impairment decisions should be made based on multiple factor analysis, rather than one at the exclusion of others, to correctly characterize impairment/attainment status.

Conservation groups like PATU know from experience that protecting water quality is far easier and cheaper than trying to clean up the damage later. In short, these designations would provide critical resources protections for some of the highest quality waters in the Commonwealth, many of which provide recreational opportunities for anglers.

We appreciate your consideration of our comments on these proposed stream designations.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory D. Malaska".

Gregory D. Malaska
PA Council President

Jennifer Orr-Greene

Jennifer Orr-Greene
Eastern Policy Director

CC: Emily Baldauff, Trout Unlimited
Amy Wolfe, Trout Unlimited
Ben Moyer, President, Chestnut Ridge Chapter Trout Unlimited
Erick Lewis, Pennsylvania Council Trout Unlimited
Robert Hughes, Pennsylvania Council Trout Unlimited
Bryan Mathie, Pennsylvania Council Trout Unlimited
Lenny Lichvar, Pennsylvania Council Trout Unlimited
Josh Lookenbill, Pennsylvania Department of Environmental Protection
Gary Walters, Pennsylvania Department of Environmental Protection
Brian Chalfant, Pennsylvania Department of Environmental Protection
Michelle Moses, Pennsylvania Department of Environmental Protection