

## **PENNSYLVANIA CAMPAIGN FOR CLEAN WATER**

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December 7, 2017

Michelle Moses  
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Rachel Carson State Office Building  
P.O. Box 8464, Harrisburg, PA 17105-8464  
Also submitted on the portal: [RegComments@pa.gov](mailto:RegComments@pa.gov)

### **Re: Extension Requested for comment and hearing for the Delaware River Basin – Triennial Review**

Dear Ms. Moses,

On behalf of the Pennsylvania Campaign for Clean Water's Exceptional Value Workgroup (PACCW EV team), we are writing to request the Pennsylvania Department of Environmental Protection (DEP) **extend the comment period pertaining to its Triennial Review for at least another 30 days beyond the end of the year. We also request that the DEP consider holding a public hearing in the Delaware River Watershed in the southeast region of the state.** The Triennial review was noted in the October 21, 2017 PA Bulletin with a comment deadline of Dec 29, 2017. By providing at least 30 more days beyond the Dec 29, 2017 deadline, after the holiday season and new year, AND providing a venue within the southeast region, we strongly believe public participation will be greatly improved to comment on the proposed standards and provide quality input and data that DEP is seeking at this time for this important process.

Upon review, the PACCW EV team is particularly interested in providing feedback pertaining to conservation easements and their use for designating and protecting special protection watersheds under the anti-degradation program. The PACCW EV team and many organizations that are part of this coalition have worked for over a decade submitting and supporting pending stream re-designation petitions in which conservation easements and land protection help strengthen and ensure water protection designations in perpetuity. In the Delaware River watershed we have an abundant network of land trusts that work very hard at the watershed level to permanently preserve riparian and adjacent natural lands by implementing rigorous conservation easements with government partners and landowners who also share this strong conservation ethic.

We believe more time is needed to engage the land trust community in the public commentary process to best represent their work as it pertains to the Triennial Review. How the PADEP defines conservation easements in terms of stream redesignations

significantly impacts their work and conservation efforts, which are keystone to permanent land and water protections in the Commonwealth.

The Pennsylvania Campaign for Clean Water (Campaign) is a coalition of over 180 environmental, conservation, sporting, and religious groups from all corners of the state that speaks in one voice in support of federal and state policies to protect and restore Pennsylvania's water resources. The Exceptional Value workgroup focuses on protection of the Commonwealth's highest quality streams.

If an extension for comment is granted, and a public hearing venue may be added in the southeast region, we request that it be announced as soon as possible so that we can respond and plan accordingly. Thank you for your consideration at this time for the triennial review process to be widened for the public, particularly for the Pennsylvania land trust community and the southeast region.

Sincerely,



Faith Zerbe  
EV Workgroup Co-Chair



Kelly A. Germann  
EV Workgroup Member