

PENNSYLVANIA CAMPAIGN FOR CLEAN WATER

Exceptional Value Workgroup
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February 12, 2021

The Honorable Patrick McDonnell
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Support for Upgrades to the Middle Lehigh and the Beaver Creek Basin

Dear Secretary McDonnell,

On behalf of the Pennsylvania Campaign for Clean Water's Exceptional Value Workgroup (CCWEV), we are writing in support but also encourage you to increase the miles of upgrades and designations for the DEP draft reports under public comment and DEP redesignation for the Middle Lehigh River region in Carbon County, PA and the Beaver Creek in Delaware County and the that were part of a stream bundle put forth by the DEP in late November 2020. We thank you for granting additional time for public comment. The CCWEV team has been corresponding with petitioners and conservation allies in these two regions to put forth additional attributes to be considered since the draft reports were issued (Please see extensive comments submitted by Delaware Riverkeeper Network and Schmid & Company Ecologists on behalf of Beaver Creek Conservancy for more details).

The CCWEV Team would be delighted to help further in moving these comprehensive upgrades along quickly to ensure all segments deserving of the highest protections are put into place to match the softer qualifiers and land conservation efforts that have been underway for years in these two regions. Both regions are in the Delaware River Watershed and deserve special protection for various reasons outlined in the technical comment provided by our CCWEV team organizations.

Providing the Exceptional Value or High Quality designation as proposed and with more public input indicating additional upgrade justifications is needed now – this is a long overdue and deserving step and a requirement of the federal Clean Water Act and Pennsylvania antidegradation policies. This antidegradation guidance complements the Pennsylvania Clean Streams Law, enacted to preserve and improve the purity of the waters of the Commonwealth for the protection of public health, animal life, aquatic life, and other beneficial uses¹. A redesignation is also aligned and beautifully complements the Pennsylvania Environmental Rights amendment, Article I, Section 27 of the Pennsylvania Constitution which states:

¹ PA DEP's Water Quality Implementation Guidance. November 29, 2003. Accessed 12.2.19 from PADEP website.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

The Pennsylvania Campaign for Clean Water (CCW) 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 and we regularly meet to discuss and support local watershed petitions, upgrades, science, and other protective measures being undertaken across the state.

Thank you for your time and consideration of these comments and the comments put on the record by our allies. We look forward to helping ensure EV designation is realized and please reach out if we can be of further assistance.

Sincerely,



Faith Zerbe
CCW Exceptional Value Co-Chair
Delaware Riverkeeper Network



Eric Harder
CCW Exceptional Value Co-Chair
Youghiogeny Riverkeeper