



December 9, 2020

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

Re: Draft Beaver Creek Stream Evaluation Report Comment Period Extension Request

Dear Secretary McDonnell,

The Delaware Riverkeeper Network (DRN) is writing in response to the Draft Stream Evaluation Report for Beaver Creek in Delaware County published in the PA Bulletin on November 14, 2020. Based on the findings of that report, the Department is recommending that one tributary be redesignated from WWF, MF to HQ-WWF, MF, and that the remainder of the Beaver Creek Basin should maintain its current WWF, MF designation. With the current 30 day public comment period, comments are due on December 14, 2020.

However, the Draft Stream Evaluation Report only examined water chemistry, macroinvertebrates, instream habitat, and the surface water of exceptional ecological significance qualifier. There are several other HQ and EV qualifiers presented in the Beaver Valley Conservancy's petition from June of 2014 that were not taken into consideration in the Draft Stream Evaluation Report and which may significantly alter the Department's final recommendation. The Beaver Valley Conservancy should have also received notice of the draft report and comment period because they are the original petitioner, but they were never notified and were therefore unaware of the comment period. Due to these circumstances, **DRN hereby respectfully requests that the Department extend the formal comment period by 60 days, to February 14, 2021.**

This comment period extension would provide sufficient time for DRN and other commenters to organize relevant information on the other qualifiers that were not examined in the initial draft report. Given the scope of the review process that has spanned over six years, 30 days is not enough time to fully, properly, and fairly evaluate the conclusion that the Department has reached. The goal of the public comment process is to provide an opportunity for the public to provide complete and meaningful review and comment. A fair period of time is not just beneficial to the public but is beneficial to the Department for ensuring your ability to fully and fairly review the data from all sources and render a fully informed decision. A 60 day extension is essential for full, fair, and meaningful public review and comment on the Draft Beaver Creek Stream

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Evaluation Report. We ask that you provide notice of any extension provided as soon as possible, so that all interested parties understand the time available for their review and comment. Thank you for your consideration.

Sincerely,



Maya K. van Rossum
the Delaware Riverkeeper

cc. Mark Brickner, PADEP
PA Fish and Boat Commission
Beaver Valley Conservancy
Schmid Ecological Consultants