



Mr. John Arway
Executive Director
Pennsylvania Fish and Boat Commission
1601 Elmerton Ave
Harrisburg, PA 17110
jarway@pa.gov

February 26, 2014

Dear Mr. Arway,

As you know, the Pennsylvania Department of Environmental Protection (DEP) has finalized its draft report for the Upper Perkiomen redesignation petition. Originally scheduled for the February 18th meeting of the Environmental Quality Board (EQB), the draft report may return to the agenda as soon as March 18th, the next scheduled meeting of the EQB. The lead co-petitioners, which include Perkiomen Valley Trout Unlimited (PVTU), a chapter of Pennsylvania Trout Unlimited, and the Delaware Riverkeeper Network, as well as over 120 organizations and individuals, submitted the petition in 2007. Lead co-petitioners also included the Montgomery County Conservation District and the Lehigh County Conservation District.

The lead co-petitioners were made aware of DEP's draft report that recommended "no change" in designations in September 2013. The co-petitioners reviewed the DEP's antidegradation assessment report and then shared additional information and comments that we felt should be considered before making a recommendation on this large upgrade area to the EQB. Also at that time, Lower Milford Township engaged Princeton Hydro to provide a review of the DEP's report for portions of the upgrade area within the Township. We have attached these two sets of comments as we understand the packet provided to the EQB may have included only the DEP response document and neither Princeton Hydro's review nor the extensive comments prepared by the lead co-petitioners.

Among the points discussed in our comments, we included information about areas where native brook trout have been observed by the community, including by members of PVTU. We learned from regional Pennsylvania Fish and Boat Commission staff that the last fish surveys conducted by the Commission in the Upper Perkiomen were undertaken in 2000. Two other studies for the Hosensack Creek watershed were conducted even earlier, in 1995 and 1983. Those studies indicated portions of the Hosensack Creek were designated Class C Wild Trout while Indian Creek, a Hosensack tributary, was designated Class B Wild Trout from the headwaters to the mouth. Although these older studies did not yield a Class A biomass

which would be needed for High Quality designation, we are concerned that the angler observations of native brook trout, a more sensitive species, coupled with the number of habitat restoration and buffer projects that have been implemented since 1997 might reveal improvements over the previous biomass results in some sections of the proposed upgrade area.

At this time, we are reaching out on behalf of our co-petitioners to inquire if Commission biologists may be able to work with us to re-survey specific reaches of the Upper Perkiomen to determine if trout biomass has indeed improved since the previous studies. As you know, a Class A designation would make the Upper Perkiomen eligible for High Quality status and qualifiers raised in the petition could then be considered or applied to the HQ sections for possible EV listings. If the Commission is interested in working with us to undertake these studies in 2014, or even in 2015, perhaps this would be sufficient cause to encourage the DEP from making a recommendation to the EQB at this time.

Finally, if DEP does choose to place the Upper Perkiomen redesignation petition on the EQB agenda in the on March 18th or the coming months, we are hoping that as an EQB member you can support the position of the co-petitioners to delay action until further science can be gathered by the co-petitioners or other interested agencies.

We would welcome the opportunity to hear your thoughts on this timely matter. Thank you for your work and support for protection of the Upper Perkiomen watershed.

Sincerely,

Chaz Macdonald
President, Perkiomen Valley Trout Unlimited, #332

Brian Wagner
President, Pennsylvania Council of Trout Unlimited

Maya K. van Rossum, the Delaware Riverkeeper
Delaware Riverkeeper Network

cc. Mike Kauffman, PA Fish and Boat Commission
Gus Meyer, Montgomery County Conservation District
Andrew Meadows, Perkiomen Watershed Conservancy
William McFadden, Lehigh County Conservation District