



November 20, 2015

PA Fish and Boat Commission
Attn: Mr. John Arway, Executive Director
1601 Elmerton Avenue
PO Box 67000
Harrisburg, PA 17106
Submitted electronically: www.fishandboat.com/regcomments

RE: Proposed Additions to PA Wild Trout and Class A Streams – January 2016

Dear Mr. Arway:

The Delaware Riverkeeper Network (DRN) is writing with strong support for the Pennsylvania Fish and Boat Commission's (PFBC's) proposal to add 100 stream segments to the Wild Trout list and 38 stream segments to the Class A Wild Trout list. The Commonwealth's trout fisheries are an important resource for residents and visitors alike, and any designations and subsequent water quality protections afforded these streams is critical to their preservation. We greatly appreciate that PFBC is advancing listings of the Hosensack and other streams that were sampled in recent 2014 and 2015.

DRN is especially pleased to see seven streams added and expanded in the Delaware River Basin proposed for Wild Trout designation and four streams for Class A Wild Trout designation (listed below). DRN is delighted to see PFBC propose to list a Hosensack Creek segment as Class A based on 2014 stream assessments due to pending threats in this basin. As indicated in prior DRN comment this year to PFBC, DRN submitted a petition requesting redesignation of the Hosensack Creek to Exceptional Value; the Environmental Quality Board (EQB) and Pennsylvania Department of Environmental Protection (PADEP) moved the petition to the review phase at the EQB's April 2015 meeting. This timely listing of the Hosensack by PFBC will help to ensure that the Hosensack Creek and other streams are protected quickly with changing threats on the ground and we support all efforts to continue these timely listings now and into the future.

However, DRN is concerned that PFBC only proposes listing a segment of the Hosensack from an unnamed tributary (UNT)640 meters downstream SR 2031 to UNT 180 meters upstream T-387 (which we understand to be Schultz Bridge Road). DRN estimates this segment to be approximately two miles long.

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawareriverkeeper.org
www.delawareriverkeeper.org

As PFBC is well aware, trout move daily as well as seasonally, and large brown trout can range more widely than juvenile fish. In the 2014 *Lower Milford Township Fishery Survey* by Princeton Hydro, commissioned by DRN, biologists found 30 larger brown trout at the Koplín site, which is located along the UNT which has its confluence with the Hosensack 180 meters upstream of T-387. Along the UNT, biologists caught brown trout up to 15 inches. The wide-ranging behavior of the large trout found in the Hosensack requires a more extensive Class A listing (report attached). DRN urges PFBC add the entire Hosensack Creek to the Class A Wild Trout List.

DRN also notes that the PFBC listing identifies this segment as Montgomery County; the segment should be identified as Lehigh County.

DRN would like to know the rationale and assessment behind PFBC's proposal to delist Flugey Hollow in Somerset County. Was this based on fish surveys and if so can more information be provided to understand the findings since a delisting could mean less protections for this stream?

PFBC Proposed Wild Trout Streams in the Delaware River Basin - January 2016

County of Mouth	Stream Name	Section Limits	Tributary To	Mouth Lat/Lon
Berks	Seidel Creek	Headwaters to Mouth	Schuylkill River	40.287894 75.863838
Berks	UNT to Ironstone Creek (Ironstone Park)	Headwaters to Mouth	Ironstone Creek	40.295008 75.676538
Chester	Broad Run	Headwaters to Mouth	West Branch Brandywine Creek	39.932119 75.680402
Chester	UNT to East Branch Brandywine Creek (RM 5.88)	Headwaters to Mouth	East Branch Brandywine Creek	39.977036 75.684059
Chester	UNT to Valley Creek (Cedar Hollow)	Headwaters to Mouth	Valley Creek	40.067417 75.517273
Schuylkill	Wash Creek	Headwaters to Mouth	Mahoning Creek	40.763056 75.893333

PFBC is considering the following revisions to the section limits of streams on the list:

County of Mouth	Stream Name	Current Limits	Revised Limits	Tributary To	Mouth Lat/Lon
Berks	Laurel Run	Headwaters to 1.3 kilometers Upstream SR 222	Headwaters to Mouth	Schuylkill River	40.379722 75.951111

PFBC Class A Proposed Streams in the Delaware River Basin - January 2016

County	Stream	Section Limits	Tributary To	Mouth Lat/Lon	Brook Trout (kg/ha)	Brown Trout (kg/ha)	Rainbow Trout (kg/ha)	Length (miles)	Survey Year
Berks	Laurel Run	3 UNT approx.	Schuylkill	40.379722	1.30	58.61	—	0.32	2013

			20 meters upstream SR 3059 to Mouth	River	75.951111					
Montgomery	Hosensack Creek	2	UNT 640 meters downstream SR 2031 to UNT 180 meters upstream T-387	Perkiomen Creek	40.425000 75.526944	—	108.13	—	2.96	2014
Schuylkill	Wash Creek	1	Headwaters to Mouth	Mahoning Creek	40.763056 75.893333	27.51	17.91	—	2.65	2015
Chester	UNT to Valley Creek (Cedar Hollow)	1	Headwaters to Mouth	Valley Creek	40.067417 75.517273	—	239.88	—	0.50	2012

On behalf of our over 15,000 members, DRN appreciates PFBC's dedication to protection of streams across the Commonwealth and for considering these important streams for addition to the Wild Trout and Class A lists in January 2016. Thank you for your time and consideration.

Enclosures: Lower Milford Township Fishery Survey, Lehigh County, Pennsylvania, Princeton Hydro, June 2014

Sincerely,

Maya K. van Rossum
the Delaware Riverkeeper