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THE COUNTY OF CHESTER



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October 26, 2010

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RECEIVED
IRRC

Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Beaver Run/ French Creek Upgrade, IRRC No. 2872, Reg. No. 7-461

Dear Mr. Coccodrilli:

The Chester County Planning Commission (CCPC) hereby expresses our support for the upgrade of the French Creek and the Beaver Run from a "High Quality" (HQ) designation to "Exceptional Value" (EV) and we strongly encourage the members of the Independent Regulatory Review Commission to approve the recommendations presented by the Environmental Quality Board and the PA Department of Environmental Protection.

The CCPC has supported this upgrade in designation since efforts began in 2003. This upgrade is consistent with the Chester County Comprehensive Plan, *Landscapes2*. Specifically, the upgrade of these streams will directly support the following policies as they relate to Natural Resources Protection:

Policy NR 3.1 Support planning and protection efforts to ensure sufficient water resources that provide a safe, clean, long-term supply of water, which meets the needs of all residents and aquatic habitats;

Policy NR 3.2 Protect the recharge, quantity, and quality of ground water in order to sustain streams, wetlands, and water supplies;

Policy NR 3.3 Protect, enhance and restore stream channels, base flows, and water quality to sustain aquatic habitats and ensure a reliable water supply;

Policy NR 3.4 Protect, enhance and restore headwaters, first order streams, and their buffers, to maintain adequate water quality and quantity throughout the watershed;

Policy NR 3.5 Protect and enhance existing sensitive water resources, including reservoirs and in-stream sources of community water supplies;

Policy NR 3.6 Protect and enhance state-designated sensitive aquatic habitats;

Policy NR 3.8 Preserve high priority, sensitive natural resource areas, including riparian buffers, 100-year flood plains, first order streams and their drainage areas, sources of public water supplies, and wellhead protection areas;

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Policy NR 3.10 Restore degraded and impaired streams and ground water to achieve state designated water quality standards and support upgrades in state stream designations where justified by stream conditions and uses;

Policy NR 3.11 Encourage implementation of strategies that reduce or eliminate soil erosion to conserve soil resources and reduce in-stream siltation and pollutants;

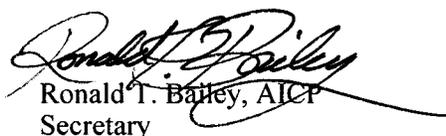
Policy NR 3.15 Support initiatives to improve water quality for the Delaware Estuary/Bay, Chesapeake Bay, and Christina River Basin;

Policy NR 3.24 Support the implementation of *Watersheds* to provide safe and reliable water supplies and wastewater disposal, while sustaining the integrity of the water resources and watershed water balances.

Chester County and the municipalities in the local area have a long history of planning for the preservation and protection of the environmental quality in the French Creek watershed. French Creek watershed provides immeasurable environmental and economic benefits to Chester County and its communities. Over the last six years, since this petition was filed, the PADEP has done extensive analyses of the conditions in French Creek and Beaver Run and has concluded that the Beaver Run and the main stem of French Creek from the confluence of the Beaver Run downstream to the Kennedy Covered Bridge should receive the designation of "Exceptional Value".

We encourage you to support the recommendation of PADEP, the results of their investigations, and the recommendation of the Environmental Quality Board by approving the designation upgrade to Exceptional Value. We appreciate the opportunity to comment.

Sincerely,


Ronald T. Bailey, AICP
Secretary

RTB/CC/yg