



PennFuture

Statement of Citizens for Pennsylvania's Future (PennFuture)
Re: EQB Regulation 7-534: Triennial Review of Water Quality Standards (IRRC #3182)
Independent Regulatory Review Commission Meeting, January 31, 2020
Submitted by Abigail M. Jones, Senior Attorney

My name is Abigail Jones and I am a Senior Attorney for PennFuture. I want to thank the Commission for allowing us to comment today regarding IRRC #3182 – the final EQB regulation on the Triennial Review of Water Quality Standards. My statements today are in addition to the written comments PennFuture submitted to the Commission on January 28, 2020 as well as PennFuture's February 15, 2018 comments to the EQB.

I am here today to urge the Commission to approve this regulatory package. The Clean Water Act requires states, on a triennial basis (meaning at least once every three years), to review and adopt new or revised water quality standards. The intent of routinely reviewing the water quality standards is to provide the opportunity to adjust and strengthen them in accordance with new and increased information for the purpose of protecting the "chemical, physical and biological integrity" of the Commonwealth's water resources.

These final regulations before you today are based on DEP's 2017 review of the Commonwealth's water quality standards. The previous triennial review was completed in 2013. Thus, these regulatory revisions to our state water quality standards are woefully overdue and the Commission should not delay this process any longer.

In fact, because we are now three years out from this 2017 triennial review, one would expect to see a new regulatory package composed of DEP's 2020 triennial review shortly. Unfortunately, it is likely that this next required review is being hindered by this lingering regulatory process. This delay is without merit.

As is explained in more detail in our January 28th letter to the Commission, the arguments raised by the Monroe County group and the national forestry and paper lobbying group and echoed by the House EREC do not warrant the Commission's disapproval of these regulatory revisions to our state water quality standards. Their arguments are flawed and self-serving and are not in the interest of the people of the Commonwealth.

The public participation on these regulations have been extensive and inclusive with extended comment periods and multiple public hearings. There are countless entities who have been waiting *years* for finality on these regulations, so that we can move forward to ensure that Pennsylvania complies with the federal Clean Water Act and that our waters are protected. It is in the public interest for the Commission to **approve** the final EQB Regulation #7-534.

Thank you.