

**PENNSYLVANIA CAMPAIGN FOR CLEAN WATER**

Exceptional Value  
1315 Walnut Street  
Philadelphia, PA 19102  
215-545-5225  
215-545-2315 fax



April 12, 2021

Independent Regulatory Review Commission (IRRC)  
14th Floor Conference Room  
333 Market Street,  
Harrisburg, PA 17101  
Submitted via: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

**Re: IRRC – No. 3226 Regulation #7-548, Water Quality Standards, Support for Class A Stream Redesignations**

Dear Commission:

On behalf of the Pennsylvania Campaign for Clean Water's Exceptional Value Workgroup (CCWEV), we are writing to express our strong support of the 42 streams in the Commonwealth proposed to receive High Quality status as part of the Pennsylvania Fish and Boat Commission's Class A package. The Class A package was noticed in the March 23, 2019 Pennsylvania Bulletin. We urge adoption of these designations now by the IRRC and have in past public comments provided support for these Class A listings and packages that are underway.

These upgrades are an essential component to protecting the public trust and the health of our communities in the Commonwealth as required by the Pennsylvania Constitution Environmental Rights Amendment. Furthermore, these HQ trout listings will also designate important wetlands associated with these trout streams as Exceptional Value, which should trigger increased protection of important wetland habitats that help clean and filter Pennsylvania water supplies and reduce flooding downstream.

This particular proposed package of 42 HQ streams will benefit eleven public water suppliers, which serve over 175,000 residents. Clean drinking water is essential to the health of all Pennsylvanians. The proposed rulemaking to HQ will afford a higher level of protection to the raw water source that serves these 175,000 residents. Recreation and outdoor enjoyment will increase for the communities where these HQ tributaries flow. Studies show increased property values in areas where clean streams and healthy forests, riparian buffers, and diverse open space habitats thrive. Recreation and outdoor enjoyment is a critical part of the eco-tourism in the state and the COVID-19 pandemic has certainly borne out this critical need for healthy and active ways for residents and visitors to explore outdoors in a safe way - with record visitors and residents seeking to enjoy Pennsylvania streams, forests and hiking trails during this unprecedented time. For all of these reasons and more, CCWEV is in full support of these Class A HQ listings for 42 deserving streams. We look forward to other FBC packages being reviewed and accepted for HQ or EV status as these upgrades clearly help our communities in Pennsylvania thrive on many levels and they are long overdue.

The Pennsylvania Campaign for Clean Water (Campaign) is a coalition of over 180 environmental, conservation, sporting, and religious groups from all corners of the state that speaks in one voice in support of federal and state policies to protect and restore Pennsylvania's water resources. The Exceptional Value workgroup focuses on protection of the Commonwealth's highest quality streams.

Thank you for your time and attention to see this important protection effort through the process to completion.

Sincerely,

A handwritten signature in black ink that reads "Faith Zerbe". The script is cursive and fluid.

Faith Zerbe  
CCW Exceptional Value Co-Chair  
Delaware Riverkeeper Network

A handwritten signature in blue ink that reads "Eric Harder". The script is cursive and stylized.

Eric Harder  
CCW Exceptional Value Co-Chair  
Youghioghenny Riverkeeper