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May 7, 2019

Secretary Patrick McDonnell  
Pennsylvania Department of Environmental Protection  
Secretary, Environmental Quality Board  
Rachel Carson State Office Building, 16th Floor, 400 Market Street  
Harrisburg, PA 17101-2301

**Re: Proposed Rulemaking: Water Quality Standards - Class A Stream Redesignations (#7-548)**

Secretary McDonnell:

On behalf of the Pennsylvania Council of Trout Unlimited (PATU) and our more than 14,000 members, we are writing today to strongly support Pennsylvania’s proposal to re-designate 41 Class A wild trout streams to High Quality-Cold Water Fishes (HQ-CWF), as published in the March 23, 2019 *Pennsylvania Bulletin*.

Trout Unlimited (TU) is the nation’s largest organization dedicated to protecting, conserving, and restoring trout and salmon fisheries and their watersheds. In Pennsylvania, our volunteers dedicate thousands of hours every year to improving streams, educating youth, and working with veterans. PATU helps chapters and partners develop and implement watershed protection plans for their local streams, and advocates for clean water policies in Harrisburg and Washington, D.C.

We appreciate the initiative that the Pennsylvania Fish & Boat Commission (PFBC) has taken over the past decade to assess and document new wild trout streams. TU scientists have contributed to this effort by surveying more than 850 waters—discovering trout in 40 percent of them.

We are pleased to see that the Department of Environmental Protection is continuing to upgrade deserving Class A wild trout streams to HQ. Protecting the water quality of these streams will help ensure that our best wild trout populations continue to thrive. This supports an outdoor recreation economy worth \$29 billion to the state; Pennsylvania boasts more than 1.3 million anglers and 16,000 miles of wild trout water. The Class A waters are the best of the best of Pennsylvania’s wild trout streams, with the largest, healthiest populations of naturally reproducing fish.

At the same time, HQ designations protect water supplies for downstream users, including farmers and industry. More than 175,000 citizens draw drinking water from the streams in question. We all know that protecting water quality at the source is far cheaper than treating it downstream.

We applaud Pennsylvania for protecting these 41 waters. At the same time, we urge DEP to move quickly to evaluate other Class A streams deserving protection—including the more than 60 streams noticed in the June 16, 2018 *Bulletin*—and advance new packages of Class A streams that are still awaiting upgrade to HQ status.

Thank you for your consideration of these comments. Please do not hesitate to contact us with questions.

Sincerely,

Greg Malaska  
President, Pennsylvania Council of Trout Unlimited

Brian Wagner  
PA Representative, Trout Unlimited National Leadership Council