

3226

May 7, 2019

RECEIVED
IRRC

2019 MAY -8 A 8:44

Via Email

Environmental Quality Board
RegComments@pa.gov



**Re: Clean Air Council's Comments on Regulation #7-548:
Water Quality Standards; Class A Stream Redesignations**

To whom it may concern:

Clean Air Council (the "Council") hereby submits the following comments on the Environmental Quality Board's ("EQB") proposed rulemaking listed as Regulation #7-548: Water Quality Standards; Class A Stream Redesignations ("Redesignations"). The Council is joined in these comments by the Academy of Natural Sciences of Drexel University (with the Council, "Commenters").

The Council is a non-profit environmental and health organization headquartered at 135 South 19th Street, Suite 300, Philadelphia, Pennsylvania 19103. For more than 50 years, the Council has fought for a healthy environment across Pennsylvania. The Council has thousands of members throughout Pennsylvania who support its mission.

Commenters strongly support the Class A Stream Redesignations. These Redesignations have been in the works for years and represent the result of many scientific measurements of trout populations in roughly 200 miles of more than 40 streams. The science is sound and the law is clear--these streams deserve the protections that the High Quality designation affords. Commenters also support the process of clearing out the backlog of Class A Wild Trout Waters that merit designation upgrades. Commenters hope and urge that the process continue so that the all the streams deserving protection receive it.

Stream protections for trout streams are most obviously crucial for sustaining angling in Pennsylvania long-term. As the Fish and Boat Commission rightly touts, Pennsylvania is home to some of the best trout fishing in the world. Adopting this rulemaking helps ensure that Pennsylvania stays that way. Protecting water quality in these streams bolsters recreation besides angling as well. Clean streams are more attractive destinations for boating, swimming, hiking, or simply enjoying a lazy afternoon in nature. Pennsylvania's natural beauty not only beckons visitors to our parks and gamelands, but immensely benefits the millions of Pennsylvanians who spend time outdoors.

Streams that are maintained clean enough for trout help ensure the purity of our drinking water and ease the burden on public and private water purification systems.

These trout streams are also worth protecting in their own right, for the benefit of the wildlife that use them or live in them. Pennsylvania is blessed with an abundance of rivers and streams. Many, though, are impaired. In the Delaware River watershed, for example, the impact of coal mining and land use change are stark on a map of impaired streams (*see* <https://www.delawarewatershed.org/#/map>). Suburbanization and the gas boom in Pennsylvania have put mounting stress on the health of our stream ecosystems in recent years, making protection efforts such as the Redesignations even more needed. For the sake of all of Pennsylvania's living beings, Commenters strongly urge the EQB to adopt the Class A Stream Redesignations.

Sincerely,



Joseph Otis Minott, Esq.
Executive Director and Chief Counsel
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103
215.567.4004
joe_minott@cleanair.org

Stefanie Kroll
Watershed Ecology Section Leader and Assistant Research Professor
Academy of Natural Sciences of Drexel University
1900 Benjamin Franklin Pkwy
Philadelphia, PA 19103
215.299.1106
sak345@drexel.edu