



August 11, 2020

Department of Environmental Protection
Policy Office, Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Submitted via online at: ecomment@pa.gov

RE: Draft 2020 Pennsylvania Integrated Water Quality Monitoring and Assessment Report

To whom it may concern:

On behalf of the Sierra Club Pennsylvania Chapter's nearly 125,000 members and supporters across the Commonwealth, we very much appreciate the opportunity to comment on the draft 2020 Integrated Water Quality Monitoring and Assessment Report and kindly request that given the ongoing compounding health and economic crises, the Pennsylvania Department of Environmental Protection (PADEP) provide at least a 90-day extension of the comment period. Doing so would ensure that watershed groups and the public alike have ample time to effectively and comprehensively review this important document. Protecting our freshwater resources requires accurate reporting and an informed public.

As a member-led grassroots organization representing thousands of residents that live, work, and play throughout Pennsylvania, we view our comment as a significant opportunity for us to weigh in on the water quality assessment of our streams. However, given the importance of this report, we also believe the time frame allotted is less than adequate to elicit the level of public participation and accurate input the report deserves. With Pennsylvania being a water-rich state, having approximately 85,500 miles of streams and rivers, and 700,000 acres of wetlands, it is incumbent upon the PADEP to provide Commonwealth residents the chance to engage with this highly sophisticated web-based resource and to analyze and evaluate the accuracy of the water quality data it contains.

That being said, we greatly respect the PADEP for the tremendous expertise and ingenuity that went into creating the online Integrated Water Quality Report and thank them for continuing to offer the report in a fully interactive digital platform that invites increased public participation in the review process of the 303(d) list of impaired waterways in PA, through a user-friendly interface. It is certainly a welcome improvement from the previous technical and cumbersome 10,000 page reports. We find this format to be very beneficial to all users as it makes the

information much more accessible and highly engaging, with colorful, high quality maps, charts and images, allowing the complex stream data to be easier to digest.

The Integrated Report's narrative description and graphic GIS maps are helpful in visibly demonstrating how well Pennsylvania's streams, rivers, and lakes are meeting our water quality standards, major sources of water quality impairment like sedimentation, pathogens, and nutrient overload, and the 303(d) list of PA's impaired streams and restoration priority watersheds that require a TMDL and additional attention. This review, which covers all of the waters of the Commonwealth, will take time for the public to provide thorough, meaningful comments. This is why we are making this extension request for at least 90 days beyond the current August 11, 2020 deadline.

In addition to the need for extended time for the public to review and comment due to the highly technical and complex nature of the Integrated Report, we sincerely believe this extension request is especially warranted during the COVID-19 pandemic, when Pennsylvanians are struggling to navigate numerous health risks and a tumultuous economy. We understand this review process is lengthy, but it's an important process we do not want to rush during uncertain times. We know clean water and clean streams are critical to overall well-being and public health.

Finally, we would also like to request that during this triennial review process that public hearings are held throughout the state, virtually or in-person when it is safe for the public to gather, to enhance understanding of the data and better connect with the public.

Thank you for your hard work in composing the draft 2020 Integrated Water Quality Report and your consideration of these comments and our request for an extension.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Rosenfeld". The ink is dark and the signature is fluid and legible.

Rachel Rosenfeld
Community Outreach Coordinator
Sierra Club, Pennsylvania