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Submitted via eComment

Department of Environmental Protection
Policy Office
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105

Re: 2020 Draft Integrated Water Quality Monitoring and Assessment Report

To Whom It May Concern:

On behalf of Center for Coalfield Justice ("CCJ") and its more than 3,000 members and supporters, please accept these comments on the 2020 Draft Integrated Water Quality Monitoring and Assessment Report ("Draft Report").

CCJ is a 501(c)(3) non-profit organization, founded in 1994. The organization's mission is to improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield residents; and to protect public and environmental health. As such, and on behalf of our members, we are very interested in matters that impact the health of waters of the Commonwealth, particularly those located in southwestern Pennsylvania, and the health of those who live, work, and recreate in Washington and Greene Counties.

CCJ appreciates the time and attention the Department of Environmental Protection ("Department") put into the development of the online interactive mapping, downloadable excel files, and summary statistics that are available as part of the 2020 Draft Report. These online interactive tools make the highly technical and complex nature of the Draft Report more accessible for the public.

Section 303(d) of the Clean Water Act requires the Department to identify surface waters that do not meet applicable water quality standards, even after the appropriate pollution control technology has been applied to point sources and the required best management practices have been implemented for nonpoint sources. As required by Section 303(d), the Draft Report includes water specific lists describing the status of the Commonwealth's surface waters. The Draft Report establishes five categories for listing surface waters. Surface waters that do not meet water quality standards and that require development of a Total Maximum Daily Load (TMDL) are placed in Category 5. The Draft Report further includes a list of waters that the Department has deemed high priority for TMDL development and waters that may be restored

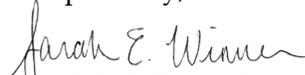
through alternatives to TMDLs (category 5alt). A thorough review of all of this information will take a considerable amount of time. In order for the public to provide meaningful comment, CCJ respectfully requests that the Department extend the public comment period. CCJ believes that an extension is particularly reasonable during the COVID-19 crisis when Pennsylvanian's are struggling to navigate these unprecedented times.

According to the Draft Report, agriculture, acid mine drainage, and stormwater/urban runoff are the leading causes of impairment in Pennsylvania streams. In Washington and Greene Counties, surface waters also suffer the impacts of underground coal mining, coal waste disposal, and natural gas development. It is possible that unidentified pollutants and sources are negatively impacting water quality and stressing aquatic life in those streams or lakes that the Department has categorized as impaired. CCJ encourages the Department to work with local watershed organizations, conservation groups and interested residents to locate and address the sources of pollution.

During its review of the Lake Assessment Report, CCJ noticed that Dutch Fork Lake, located in Washington County, is listed as impaired since 2002. The source of impairment is listed as unknown. However, using the same interactive maps, all of the tributaries supplying Dutch Fork Lake are listed as attaining uses and are not impaired. It is not clear why Dutch Fork Lake is impaired for aquatic life uses when all of the tributaries supplying Dutch Fork Lake are attaining their aquatic life uses. If Dutch Fork Lake's impairment status is based on an assessment that was performed in 2002 (or earlier), CCJ encourages the Department reevaluate the health of Dutch Fork Lake. To the extent that Dutch Fork Lake's aquatic life uses remain impaired, CCJ encourages the Department to investigate the cause of impairment and develop a plan to mitigate the impacts to Dutch Fork Lake and protect it in the future.

Thank you for your consideration. Should you have any questions, please contact me anytime.

Respectfully,



Sarah E. Winner, Esq.

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