

BEAVER VALLEY CONSERVANCY
138 Beaver Valley Road
Chadds Ford, PA 19317

4 December 2020

Patrick McDonnell, Secretary
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

pmcdonnell@pa.gov

In re: **Request for Extension of Comment Period – Beaver Creek**

Dear Mr. McDonnell,

The Department recently completed its draft Stream Evaluation Report for Beaver Creek (Brandywine Creek, Delaware County). The Department is recommending that one waterway (UNT 00009 to Beaver Creek) be redesignated from WWF,MF to HQ-WWF,MF, and that the other streams in the Petition area remain at their current WWF,MF designation. I understand that public comments on the draft Report are to be submitted to the Department by 14 December 2020. **I hereby request that the Department extend the formal comment period by 60 days, to 12 February 2021.**

Since our filing of the Petition in June 2014, there have been significant and relevant changes that have occurred within the Petition area which we believe lend additional support to validate the redesignation of one or more of the streams in the Petition area. I wish to identify those recent changes for the Department's consideration prior to its making a final recommendation.

Although notice of release of the draft Report apparently was made in mid-November, I only learned about it earlier this week when the Delaware Riverkeeper Network informed me of it. As the Petitioner, I would have expected to have received notice directly from the Department when the Report was released. As it is, I now only have 10 days to submit comments, which is not adequate time to compile and describe the new issues satisfactorily. Given that the Petition has been under review for 6.5 years, an additional 60 days at this point is insignificant, especially if it allows the Department to more accurately identify and protect the existing uses of the subject waterways.

Thank you for your attention to this matter. If you have any questions regarding this request, you may reach me at the above address or through email (diana.mccarthy@faegredrinker.com) or telephone (215-450-4839).

Sincerely,


Diana McCarthy
Executive Director

cc: Mark Brickner mbrickner@pa.gov
Dr. James A. Schmid (Schmid & Company, Inc.)