



November 13, 2019

Delaware River Basin Commission
P.O. Box 7360
West Trenton, New Jersey 08628

Re: Comment on Delaware River Basin Commission Docket No. D-1970-052 CP-2, City of Philadelphia, Northeast Wastewater Treatment Plant Upgrade, City of Philadelphia, Pennsylvania

This comment is submitted by Delaware Riverkeeper Network on behalf of our approximately 23,000 members throughout the Delaware River Watershed including members whom live in Philadelphia, the Greater Philadelphia region, the tidal regions of New Jersey, Delaware, and the Delaware Estuary and Bay.

The draft docket approves an upgrade to the existing 210 million gallons per day (mgd) Northeast Wastewater Treatment Plant (NE WWTP) and its discharge. The Docket states: "...the upgrade consists of constructing an additional preliminary treatment system for conveyance of peak wet weather flows to the existing primary settling and chlorination disinfection system for treatment prior to discharge, which will reduce combined sewer overflows (CSOs) from the WWTP's service area. The WWTP will remain designed for an annual average flow of 210 mgd."

Delaware Riverkeeper Network only recently became aware of this project and we have significant concern regarding the adverse impacts of the discharge and the DRBC's legal obligation to maintain and protect the existing uses that are now being realized in Zone 3 of the mainstem Delaware River, the surface waters into which the WWTP is proposing to continue its discharge of increased quantities of treated effluent.

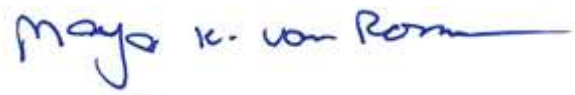
In particular, data clearly demonstrates that fish propagation is occurring in Zone 3, necessitating recognition that the existing use for this zone is warm water fishes (WWF) maintenance **and propagation**. Moreover, we have grave concerns that the increased discharge will detrimentally impact the recreational use of the estuary.

Given the serious impacts of the proposed upgrade, we respectfully request that the hearing on the docket be postponed to allow the impacted and interested community the opportunity for additional review and comments. This additional time will also permit DRBC reflection as to whether the antidegradation analysis has been properly performed so that it will be legally sufficient and will not otherwise violate the Pennsylvania Clean Streams Law, the Federal Clean Water Act and the Pennsylvania Constitution.

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawareriverkeeper.org
www.delawareriverkeeper.org

We appreciate your attention to this important request. Thank you for the opportunity to comment today.

Submitted by:

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is written in a cursive style with a long horizontal line extending to the right.

Maya K. van Rossum
the Delaware Riverkeeper

keepermaya@delawareriverkeeper.org