



December 18, 2017

Mark Brickner  
PADEP Division of Water Quality  
Bureau of Clean Water  
P.O. Box 8774  
Harrisburg, PA 17105-8774

**Re: Support of the Marsh Creek Redesignation Petition**

Dear Mr. Brickner,

The Delaware Riverkeeper Network (DRN) is writing in support of the stream redesignation petition submitted by the French & Pickering Creeks Conservation Trust in September 2016 to redesignate Marsh Creek in Chester County from High Quality (HQ) to Exceptional Value (EV). DRN also requests to be added to the notifications for this stream upgrade as this study continues through the petition process since the tributary flows into the Delaware River Basin and we have a keen interest in helping to support it and see it through. Over 12 years of macroinvertebrate data have been collected in Marsh Creek and the results show strong evidence of high biological diversity and ecological integrity. The Chester County Index of Biotic Integrity (IBI) from 1998-2009 scored Marsh Creek as 99.96, the highest of all 320 samples collected. The large amount of wetlands and wooded areas combined with less than 1% urban land use created stable physical and chemical habitat conditions that supported the most diverse benthic-macroinvertebrate community in Chester County.

These conditions remain currently and greater protections are needed to ensure that future land use in the watershed does not compromise their integrity and degrade the value of this exceptional quality stream. Marsh Creek meets several qualifiers that meet the requirements for EV status, including that *“the water is an outstanding National, State, regional or local resource water”* and *“the water is a surface water of exceptional ecological significance.”* In addition, Marsh Creek meets the qualifier stating that *“the water achieves a score of at least 92% (or its equivalent) using the methods and procedures described in subsection (a)(2)(i)(A) or (B).”*

Finally, the Marsh Creek watershed includes the 2,500 acre Great Marsh. The Great Marsh is an Exceptional Value (EV) wetland because it exhibits two EV qualifiers under PA Code 105.17 (threatened and endangered species habitat and is located along a public or private drinking water supply). These

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wetlands provide habitat for the federally threatened bog turtle and the PA Special Concern Species spotted turtle, both of which have been identified and documented in the Great Marsh. Redesignating Marsh Creek as EV would make the stream more in line with the current EV status of the Great Marsh wetlands within the watershed. This combined with the EV qualifiers it satisfies and the strong scientific evidence collected for over a decade showing high ecological integrity and exceptional water quality, clearly indicates that Marsh Creek is deserving of being recognized as EV. Thank you for your time and if there is anything we can assist with please contact my Monitoring Director Faith Zerbe at 215-369-1188 ext. 110.

Sincerely,

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

Maya K. van Rossum  
the Delaware Riverkeeper