



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 UNT to Whetstone Run Redesignation Petition

Dear Mr. Brickner,

In response to the November 18, 2017 Pennsylvania Bulletin notice, the Delaware Riverkeeper Network (DRN) is writing to share our support of the stream redesignation petition submitted by the Darby Creek Valley Association on August 5, 2016 to redesignate an UNT of Whetstone Run in Delaware County from Warm Water Fishery (WWF)/Migratory Fishery to High Quality (HQ)/Migratory Fishery. 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. The petitioners indicate that the water quality of the unnamed tributary, which is Whetstone Run's southern tributary, displays characteristics deserving of HQ designation. Its current designation of WWF does not accurately reflect the current water quality conditions of this stream. A change to HQ would be more accurate and offer greater degradation protection for this important headwater tributary.

One of the areas most affected by a redesignation would be stormwater management. The UNT's current designation of WWF only requires the management of stormwater volume for storms of frequent recurrence, up to and including the 2-year, 24-hour storm event. There are currently no stormwater runoff volume management requirements for larger, less frequent storms, with the exception of the rate-of-release from new impervious surfaces. A change to HQ status would require the management of the volume from all stormwater runoff from all new impervious surfaces, therefore offering greater runoff protection for the stream.

The UNT also has great ecological significance, as it serves as a refuge for several species of pollution-intolerant aquatic insects such as mayflies, stoneflies, and caddisflies. The presence of these species is indicative of high water quality. In fact, these species are almost completely absent from every other water

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body in the Darby Creek watershed, making the southern UNT to Whetstone Run a rare high quality stronghold in the watershed. The quality of the water of the UNT is so high that DCVA found that it functions within 83% of the same functions as Hotland Run, a nearby Exceptional Value (EV) stream. Both the UNT and the Hotland Run contain diverse, well-balanced benthic communities of the same or similar species, yet Hotland Run is designated EV while the UNT is designated WWF. By protecting this headwater stream with its proper designation, we are also assisting to protect communities downstream where flooding and other problems are common.

PADEP's biological criterion for changing the water quality of a stream requires an 83% similarity to the reference stream, which this UNT meets. While the UNT is too small to support a trout population, it is still a surface water of exceptional ecological significance. A surface water of exceptional ecological significance is defined as, "*a surface water which is important, unique, or sensitive ecologically, but whose water quality as measured by traditional parameters (for example chemical, physical, or biological) may not be particularly high, or whose character cannot be adequately described by these parameters.*" It's clear that the southern UNT to Whetstone Run fits that definition and should therefore be redesignated to HQ status. Designating this UNT as HQ would be more scientifically accurate within PADEP's biological criteria and would give this stream the protection it deserves at the same time. 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 fluid and cursive, with a long horizontal line extending to the right.

Maya K. van Rossum
the Delaware Riverkeeper

cc. Laura Edinger