



CENTER FOR COALFIELD JUSTICE

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June 1st, 2024

Jessica Shirley,
Interim Acting Secretary
Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Thank you for the opportunity to provide input on the redesignation of the unnamed tributary (UNT) in the North Fork Dunkard Fork basin. The Center for Coalfield Justice (“CCJ”) respectfully submits the following comments.

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3)-status recognition located in Washington, PA. Our mission is to “improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health.” CCJ has over three thousand members and supporters and is governed by a volunteer Board of Directors. As such, and on behalf of our members, we are very interested in matters that impact the health of the waters of the Commonwealth, particularly those located in southwestern Pennsylvania, and the health of those who live, work, and recreate in the communities we serve.

The department's evaluation of the UNT to North Fork Dunkard Fork basin and recommendation to change the current designation from Trout Stocking to Exceptional Value is the best decision from an evidence-based and regulatory standpoint.

As the report states, the water chemistry samples indicate a stream within healthy levels, with good resiliency in dissolved oxygen levels, temperature, and pH. The in-stream vegetation represents a biodiverse ecosystem with high productivity and rich in ecological services. The benthic community is rich in pollutant-intolerant taxa. As indicated in your report all of these factors indicate a stream of high value.

The protection of these resources is critical for systems beyond this ecosystem. Streams are important pathways of nutrients and other ecological services critical to surrounding communities - both biological and human. These systems are sensitive to pollutants. Without proper protections, they can become pathways for pollutants to flow further than the immediate source of impact, causing lasting damage to adjoining ecosystems. The department's foresight in redesignating this stream not only protects the immediate area, but also downstream communities of native flora, fauna, and people. The Center for Coalfield Justice fully supports the recommendation made from this report and will continue to advocate for regulatory decisions based on evidence and done with an abundance of caution in protecting these resources.

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

Respectfully,

Jason Capello

Community Advocate

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