

**Testimony by
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Rachel Carson Auditorium
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Good morning.

I am David Strong, Chair of the Citizens Advisory Council to the Pennsylvania Department of Environmental Protection. With me today is Sue Wilson, Executive Director of the Council.

I am pleased to have the opportunity to offer comments on Council's behalf on the *Antidegradation Implementation Guidance*. The Council has always had a strong interest in protecting our water resources, and has been involved in helping to shape the antidegradation program for many years.

Water, a vital resource essential for human life and health, is one of Pennsylvania's most abundant resources. As noted by the 21st Century Environment Commission, Pennsylvania has historically taken its water supply for granted because of this natural abundance. However, continued growth, sprawling development patterns and rising per capita water use place increasing pressures not only on water supplies but also on water quality.

Council advocates a holistic, comprehensive approach to water resource management. Pennsylvania's current approach is piecemeal at best, and has resulted in a hodgepodge of laws and authorities. Pennsylvania's policy and resulting programs need to comprehensively protect and manage both water quality and quantity.

The antidegradation program is a critical piece of this comprehensive approach. Council supported the regulation as published; the newly implemented process is an improvement over both the old program and the regulation as it had originally been proposed. However, Council had also expressed concern over the fact that *Antidegradation Implementation Guidance* was not made available for public comment at the time the regulations were being considered. The issues addressed in the *Guidance* are critical to the program, and deserve and require equal attention, to ensure effective implementation of the program.

The Department recognized this concern, and undertook extensive efforts to solicit broad input into the development of this critical document. We commend the Department for these efforts; it has gone well beyond the norm. The current version of the *Guidance* is the product of numerous discussions with the Water Resources Advisory Committee, the membership of which was expanded specifically to broaden the range of views considered in developing this document. In addition, the *Guidance* is now open for further public review and comment, including these public hearings. Comments and recommendations received during this public review will be considered prior to finalizing the *Guidance*.

The Citizens Advisory Council has decided to postpone developing specific comments and recommendations on the *Guidance* until we have the benefit of the input being received by the department during the formal comment period and at the four hearings that are being conducted. We will use the input received to inform our own deliberations, and to make recommendations on how the department should accommodate and respond to the various viewpoints. We will carry out our review with all possible speed, to avoid any undue delays in finalizing the *Guidance*.

Thank you again for the opportunity to provide Council's comments. We look forward to working with Water Deputate staff in finalizing this important document.