

DEP Northwest Regional Office
% Waterways & Wetlands Program
230 Chestnut Street,
Meadville PA 16335-3481

June 9th, 2026

**RE: Public Comment on Chapter 105 Joint Permit Application Amendment (E3206225-004)
Homer City Generation Power Block Project**

To the Pennsylvania Department of Environmental Protection, Bureau of Waterways Engineering and Wetlands,

Three Rivers Waterkeeper (3RWK) respectfully submits the following comments regarding Chapter 105 Joint Permit Application Amendment (E3206225-004)¹ for the Homer City Generation Power Block Project.

The proposed amendment raises questions regarding the accuracy and completeness of the project's wetland impact accounting. By reclassifying Wetland W-22, a 0.08-acre non-federally jurisdictional wetland, from a temporary impact to a permanent impact, Homer City Generation LP increases total permanent wetland impacts from approximately 1.534 acres to 1.614 acres while reducing temporary impacts from approximately 0.927 acres to 0.847 acres. While the acreage change is relatively small in the context of the overall project, the reclassification nonetheless represents a permanent loss of wetland resources rather than a disturbance expected to be restored following construction.

Although the amendment increases permanent wetland impacts by only 0.08 acre, the reclassification of Wetland W-22 from a temporary to a permanent impact represents a change in the nature of the project's effects on aquatic resources. Consistent with 25 Pa. Code Sections 105.14², 105.18a³, and 105.20a⁴, Homer City Generation LP should demonstrate that the revised permanent wetland loss does not alter prior avoidance and minimization analyses, and that compensatory mitigation remains sufficient to replace lost wetland functions and values.

¹ PA DEP. [Chapter 105 JPA Homer City Generation Power Block Amendment](#).

² 25 Pa. Code [Sections 105.14](#).

³ 25 Pa. Code [Sections 105.18a](#).

⁴ 25 Pa. Code [Sections 105.20a](#).



Three Rivers Waterkeeper
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Thank you for your time and consideration.

Sincerely,

A handwritten signature in green ink that reads "Heather Hulton VanTassel".

Heather Hulton VanTassel, PhD
Executive Director, Three Rivers Waterkeeper
Heather@threeriverswaterkeeper.org