

**Act 220 - Delaware Region  
CWPA Public Comments**

| Watershed     | Organization / Agency / Individual                                  | Signer                | Testimony Dated / Letter Dated | Letter Received | Position | Comments  |
|---------------|---|-----------------------|--------------------------------|-----------------|----------|---|
| T<br>Brodhead | Meiser & Earl, Inc.   | Jay F. Lynch          | 11/5/2009                      |                 | Against  | <ol style="list-style-type: none"> <li>1. August 2009 document does not provide strong evidence of meeting the designation criteria of Guidelines</li> <li>2. High-yield public water-supply wells possible in headwaters without affecting stream flow on a 1 to 1 ratio</li> <li>3. Buck Hill Water Company - issue with the discharge not being included (DRBC staff note: did include a discharge at the location of the NPDES permit for a Buck Hills Inn)</li> <li>4. Questions how methodology treats on-site septic systems supplied by public water as 100% consumptive</li> <li>5. Avenir site now receiving water from Brodhead Creek Regional Authority</li> <li>6. Impoundment evaporative loss on water supply reservoirs questioned and its relationship to Q710</li> <li>7. Very strongly criticizes the regression equation used to calculate Q710</li> <li>8. Feels its premature to label Brodhead Creek as CWPA, suggests further testing through a partnership over the next 3-5 years</li> </ol>  |
| Brodhead      | R.K.R. Hess Associates  | Russell D. Scott      | 11/25/2009                     | 11/25/2009      | Against  | <ol style="list-style-type: none"> <li>1. Premature to label Brodhead Creek as CWPA</li> <li>2. Water supplied by Buck Hill Falls Water Co. is discharged back into Brodhead as treated effluent via stream outfall (DRBC staff note: did include a discharge at the location of the NPDES permit for a Buck Hills Inn)</li> <li>3. Swiftwater Creek - should no longer be considered problem area due to Sanofi Avenir being supplied with public water</li> <li>4. Sambo Creek - water supplier is actually "Borough of East Stroudsburg," not ES Municipal Authority</li> <li>5. Evaporative loss on water supply reservoirs questioned and its relationship to Q710, questioned Q710 estimations given gage info provided in report at Minisink Hills</li> <li>6. Brodhead Creek is not critically impaired</li> <li>7. Being considered based on projected future population growth &amp; demands</li> <li>8. Data from existing stream gages should be used for assessment as CWPA, if withdrawals are being estimated there should be estimates for the wastewater also</li> <li>9. Both the Brodhead Creek Regional Authority and the Borough of East Stroudsburg's opinion - premature to make a CWPA</li> </ol> |
| Brodhead      | Brodhead Forest and Stream Association                              | Arnold S. Hoffman     | 11/10/2009                     | 11/23/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.   |
| T<br>Brodhead | Brodhead Watershed Association                                      | Patricia M. Kennedy   | 11/9/2009                      |                 | Support  | Community member, has watched fluctuations in McMichael's Creek for 3 years<br>Notes BCRA installation of sewer lines in her neighborhood and generally questions what this means for development.  |
| Brodhead      | Brodhead Forest and Stream Association - Culbro, LLC.<br>Letterhead | Edgar M. Cullman, Jr. | 11/8/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.   |
| Brodhead      | Brodhead Forest and Stream Association                              | Daniel E. Gold        | 11/8/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.   |
| Brodhead      | Brodhead Forest and Stream Association                              | Dorina Wazo           | 11/8/2009                      | 12/1/2009       | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.   |
| Brodhead      | Brodhead Forest and Stream Association                              | Doug Swift            | 11/8/2009                      | 12/1/2009       | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.   |
| T<br>Brodhead | Brodhead Watershed Assoc.   | Edie Stevens          | 11/9/2009                      |                 | Support  | Comments most strongly pertain to growth in the region and need for sound planning to manage it. Forests critically important to drinking water<br>List of top scoring watersheds for drinking water-East Branch Del., Middle Del-Mongaup-Brodhead, Upper Del. quoted from USFS publication (abstract and table attached)<br>Buck Hill Creek headwaters decreased with deep wells drilled in a neighboring watershed.<br>Possible 30% loss in stream base flow in future  |
| Brodhead      | Eugene Patrick Hughes, Jr.  | Eugene P. Hughes, Jr. |                                | 11/23/2009      | Support  | Short note of support.  |

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|   | Brodhead      | Henryville Flyfishers   | Richard J. Shackleton | 11/11/2009                     | 11/16/2009      | Support  | Firmly supports protection of the Creek. <b>Notes its renowned trout fishing.</b> Comments on threats of "overpopulation, overdevelopment, and excessive withdrawal of groundwater" Urges nomination.  |
|   | Brodhead      | Monroe County Conservation Dist.  | Craig Todd            | 11/19/2009                     | 11/23/2009      | Support  | Notes HQ and EV streams and the wastewater that development will bring. Comments that stream is at assimilative capacity already on the Brodhead located at the mouth of the Delaware. Notes that the watershed has numerous interested parties and a variety of resources available to contribute to a CWPA, which is mentioned as "the next logical step".   |
|   | Brodhead      | Monroe County Planning Comm.  | Edward Cramer         | 11/5/2009                      | 11/9/2009       | Support  | "Sufficient evidence to support the nomination of the Brodhead Watershed for the CWPA designation"   |
|   | Brodhead      | Monroe County Watershed Alliance  | Trish Attardo         | 11/6/2009                      | 11/9/2009       | Support  | Notes HQ EV streams and valued watershed for CWF and PWS. Notes development pressures and recent development of commercial corridors. Urges CWPA and associated planning to help effectively manage future public water and wastewater systems. Notes the resources of the regions 4 watershed groups as valuable to helping the CARP process.   |
|   | Brodhead      | Brodhead Forest and Stream Association - Peter J Solomon Company Letterhead | Unreadable            | 11/10/2009                     | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Pike County Office of Planning  | Scot Boyce, Jr.       | 11/17/2009                     | 11/23/2009      | Support  | Extends full support, interested in protecting the watershed from commercial and residential development. Urges planning for aquatic and PWS needs. Both the Pike County Office of Community Planning and the Pike County Planning Commission support. Feel nomination is consistent with the Pike County Comprehensive Plan and Pike County Open Space Plan.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | Richard Pomuartz      | 11/8/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | Roger Hess            | 11/8/2009                      | 11/23/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | Tracey Warmus         | 11/8/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | Unreadable            | 11/8/2009                      | 11/24/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | William Geddes        | 11/8/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
|   | Brodhead      | Brodhead Forest and Stream Association                                      | Susan Brozena         | 11/9/2009                      | 11/16/2009      | Support  | Pleased at consideration for CWPA, notes trout habitat and development in the region.  |
| T | Brodhead      | Monroe County Commissioners   | Theresa Merli         | 11/9/2009                      |                 | Support  | Highest projected growth rate (residential and commercial)<br>Number 1 listed concern in The Monroe County 20/20 Comprehensive plan is to preserve and enhance natural resources including water quality and quantity, also item in Brodhead River Conservation Plan and other local publications. Point is that there is a community of concerned groups willing to participate in the CWPA/CARP process. The development of a CARP in the Brodhead as the logical next step. |
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| T | Little Lehigh | Lehigh County Authority   | Liesel Adam           | 11/9/2009                      |                 | Against  | 1. DEP's suggestion that water use restrictions serve as evidence of existing water supply shortages in the basin is a misrepresentation. Believes the restrictions were driven by issues of pipes and pumps, rather than actual water availability<br>2. Current data not adequate to draw conclusion<br>3. Screening model may not be appropriate method to evaluate complex carbonate geology<br>4. Support gathering data  |

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| Little Lehigh | Lehigh County Authority            | Aurel Arndt                       | 11/24/2009  | 12/2/2009       | Against    | <ol style="list-style-type: none"> <li>1. Comment on delays in projects to expand wells to meet demands resulted in water-use restrictions, not inadequate supplies.</li> <li>2. Nomination made without proper justification</li> <li>3. Complex carbonate geology</li> <li>4. Wastewater system, which is tied to negative pour points, provides important economic growth and environmental quality and is part of planned approach and not reflective of safe yield impacted.</li> <li>5. LCA has agreed to meet additional water demands by purchasing increasing amounts from City of Allentown</li> <li>6. Offers 3 graphs in contrast to Supporting Documentation</li> <li>7. Lack of local representation on the regional cmmt. has resulted in analysis of data that may not reflect actual conditions</li> <li>8. LCA claims to have never received an opportunity to comment or participate in verification process.</li> <li>9. No funding mechanism to conduct CWPA.</li> <li>10. CWPA would place burden on LCA and City without funding.</li> <li>11. Data required for further analysis. LCA willing to participate collaboratively through other avenues.</li> </ol> |  |
| T             | Little Lehigh                      | Jane Benning                      |   |                 | Support    | South Mountain significant part of watershed<br>Recognized as exceptional & threatened   |  |
| T             | Little Lehigh                      | Sierra Club                       | David K. McGuire, Ph.D.                               |                 | Support    | Supports an upgrade to EV CW stream. States: Exponentially increasing withdrawal by LCA, sewage leaks form LCA pipes, and general abuse by LCA<br>Lack of storm water management plans   |  |
|               | Little Lehigh                      | Wildlands Conservancy             | Christopher Kocher                                    | 11/24/2009      | 12/1/2009  | Support  | Notes the streams HQ CWF status and naturally reproducing brown trout population. Also its water supply function. Mentions its policy of supporting any policy of protection of natural resource.  |
| T             | Little Lehigh                      | Janet Keim                        |   | 11/9/2009       |            |  | Notes that the stream has gone dry numerous times during her lifetime. Also mentions that since the interceptors construction sewage lines have leaked into the Little Lehigh during periods of heavy rains.   |
|               | Little Lehigh                      | City of Allentown                 | Mayor Ed Pawlowski                                    | 11/25/2009      | 12/4/2009  | Against  | Nomination made without proper justification: deficits shown in the water budget result from placement of pour points, groundwater in the area is fine as evidenced by consistent yields from Schantz and Crystal springs. LCA restrictions related to project delays and not shortage of water resources. Believes Little Lehigh becoming a CWPA will needlessly hinder economic viability of the City and surrounding area.  |
| T             | Little Lehigh                      | Rob Hamill                        | Rob Hamill  | 11/9/2009       |            | Support  | Provided documentation in addition to his testimony in the form of emails and a letter to an unnamed addressee. Discusses the streams headwaters going dry in the 60's, 70's and '81 due to transfers of water out of the basin and expresses concern over LCA selling water to bottling company.  |
|               | Little Lehigh                      | Trout Unlimited?                  | Stacey Reed (possibly supplied by Rob Hamill as well) | Unknown         | Unknown    | Support  | Appears to be a mass email from Stacey Reed of Trout Unlimited to interested parties urging them to read an article in the June 29, 2009 Morning Call newspaper. The article details the restrictions enforced on the LCA's customers at the time due to concerns that demand would exceed supply.   |
|               | Little Lehigh                      | Little Lehigh Watershed Coalition | Jay Goldstein   | Unknown         | Unknown    | Support?   | Appears to be testimony from some other forum, which consists of numerous quotes from various documents regarding stream quality. PADEP and EPA. As a stand alone document this is a bit vague and difficult to understand the stance of the subcommittee.   |
|               | Little Lehigh                      | Miscellaneous                     | Miscellaneous   | Unknown         | Unknown    | Support  | Collection of newspaper clipping reporting on instances of the Little Lehigh going dry. Letter to DRBC Ex. Director Goddard drawing attention to report "Water Resources of Lehigh County, Pennsylvania Geological Survey, Water Resources Report 32." Also included 2000 letter to City of Allentown drawing attention to high turbidity levels in the Little Lehigh  |
|               | Little Lehigh                      | Lehigh Valley Planning Commission | Geoffrey Reese  | 12/17/2009      | 12/22/2009 | Against  | <ol style="list-style-type: none"> <li>1. Acknowledges and supports the written testimony prepared by the City of Allentown and Lehigh County Authority. (PADEP not meeting CWPA guidelines, questioning use of screening tool in complex geology, lack of consideration of reduced PWS usage over past 30 years, and lack of consideration of partnership between the city of Allentown and LCA)</li> <li>2. LVPC claims to have not received an opportunity to comment or participate in verification process</li> <li>3. Feels DEP has provided insignificant justification for nomination, insufficient stakeholder input</li> <li>4. Requests more scientific proof, and stakeholder involvement before moving forward with nomination process</li> </ol> |

\* T = Testimony at 11/9/09 Public Meeting