



The Pennsylvania House Committee
on Environmental Resources and Energy

Comments on Wetland Issues and Legislation
Submitted by The Brodhead Watershed Association
August 25, 1995

The Brodhead Watershed Association is a non-profit organization formed in 1989 to promote and preserve the environment of the Brodhead watershed and the water quality of all the creeks in the watershed.

The Brodhead watershed is a 285 square mile area of hills and valleys draining into the Brodhead Creek. The watershed stretches from Pike County and Barrett Township in the north, McMichaels in the west, through the Stroudsburgs, and ends at the Delaware River. The McMichaels, Paradise, Pocono, and Brodhead creeks and their tributaries are included in the watershed. The watershed includes all or part of 17 municipalities, and most of the recreation and residential area traditionally known as the "Poconos".

The Brodhead Watershed Association believes that the future of the watershed and water resource protection lies in your hands. Our wetlands play a major role in maintaining the high quality associated with the streams in this region. We agree that the permitting process may be tedious and time consuming, but we caution you to look carefully before changing the spirit of the legislation. Instead we would urge you to work on fine-tuning the administration of these regulations.

Please accept for your review the following comments pertaining to the proposed General Permit BDWW-G15 Private Residential Construction & 401 Certification:

It is our understanding of this proposed General Permit that 0.5 acre of fill will be allowed to be placed in a wetland, or 0.5 acre of wetland can be excavated, for the purpose of building a private home. Our organization objects strongly to this provision. We are concerned about the impact of this proposal on the Brodhead watershed, simply because this region is home to many wetlands both large and small. In fact the Pocono region contains over 20% of all of the wetlands in the Commonwealth.

As you know, wetlands are more than puddles, they are swamps and bogs that serve as a unique habitat and resource. Wetlands are essentially nature's sponge that not only help in flood control, but also act as filtering recharge zones for groundwater supplies. It's clear that our fine water quality and excellent recreational fisheries are dependent upon the protection of our existing wetlands. The outstanding water quality of the Brodhead watershed is part of the attraction of the Poconos as a place to live and to vacation. If the qualities that bring people here are destroyed, the economic base of the area could also be destroyed.

Rapid growth in the Pocono region originally caught our local governments unprepared. We had little in the way of technical knowledge to base decisions upon regarding land use. Over the years we've learned that responsibility is the key when it comes to development. Municipalities are finally beginning to work together toward sound planning. Much of this planning is based upon existing wetland regulations. Weakening these guidelines will result in a significant loss of wetlands on the township level.
(over please)

Many of the headwaters streams of the Brodhead watershed rise in the wetlands on the area known as the Pocono Plateau. We are familiar with the study done by the Monroe County Conservation District on the numbers of undeveloped wetlands lots in existing subdivisions on the Pocono Plateau. Many of these lots are not owned by individuals, but were retained by the developer as undevelopable lots.

If the wetlands on these lots were to be filled, we believe the cumulative impact on the headwaters tributaries in the Brodhead watershed would be significant and could have a major impact on water quality throughout the watershed.

Prior to 1984 many people anxious to move to the "country" bought properties that were unbuildable simply because there were no regulations. Perhaps these individuals should be given permit consideration, but this should be done on a case by case basis. There is no justification for watering down standards to satisfy demands by those who acquired properties containing wetlands after 1984.

We are also concerned about the impact on water quality when buyers purchase individual lots consisting of filled wetlands. Private home septic systems constructed on this type of base could fail and pollute nearby wetlands.

We have reviewed the Monroe County Conservation District's comments and agree with their suggestion that a General Permit could be designed that provides relief for individuals who have owned lots containing wetlands since before the Chapter 105 regulations were adopted but minimizes the impact on the natural systems that depends on wetlands.

Monroe County is fortunate to have an excellent technical staff in the County Conservation District office. They are the team that logically reviews and determines how specific construction needs can be accommodated while protecting the resource in a fair and objective manner. In addition, the County Conservation District has cultivated a fine working relationship with the municipalities. We have found their comments relating to this proposal to be excellent. Remember, these are the people who work with wetland decisions every day. Their input should be considered invaluable.

As citizens of Pennsylvania and more specifically residents of the Pocono Mountains, we do not pretend to understand the scientific mechanics utilized in the classification of wetlands. However, we do know that our streams are clear and our well water is pure. Please reconsider this proposed General Permit. As legislators you should be concerned with making the permitting process smooth and efficient. Give the responsibility of wetland definitions and protection to those with the technical background whose motives are in the interest of us all. Together you can develop a program that truly meets the needs of both individuals and the natural systems we depend on. The future of our wetlands is in your hands and our children will be the benefactors of your decision.

Thank You for the Opportunity to Make these Comments,



Jill Shoemith, BWA Board Member