



Brodhead Watershed Association

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www.brodheadwatershed.org

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May 16, 2022

TO: Hamilton Township Supervisors
Stroud Township Supervisors
Pocono Township Commissioners
Stroudsburg Borough Council
HSPS Project Manager, Michelle Brummer, Gannett Fleming, Inc

RE: Hamilton, Stroud, Pocono, Stroudsburg (HSPS) Regional Comprehensive Plan

Comments by the Brodhead Watershed Association

The Brodhead Watershed Association has reviewed the Draft HSPS Regional Comprehensive Plan and find the Plan includes much important information and valuable recommendations. We are particularly pleased to see the Action items related to managing land use regionally and cooperatively.

However, we believe that additional recognition should be given to the importance and value of the excellent water quality in streams and wetlands in the Project Area. Although the Plan notes that:

Water quality in the HSPS region is high. All but four waterways in the HSPS region are designated HQ Waters. Indian Run and Swiftwater Creek in northern Pocono are designated EV Waters.

And

The 2019 survey of residents, completed as part of the planning process shows that "water quality protection" is important to 90.2% of respondents.

BWA finds no recommendation or action step devoted to maintaining and protecting surface and groundwater quality or the importance of healthy streams and wetlands to the Monroe County's major industry, tourism.

Nor do we find recognition that the Swiftwater Creek and Indian Run are headwaters tributaries of the Paradise Creek, itself a major tributary of the Brodhead Creek and the water supply source for thousands of residents in the Project Area, and elsewhere.

BWA does not find a recognition, action step, or recommendation on implementation of the Municipal Separate Storm Sewer System (MS4) program. Pocono Township, Stroud Township, and Stroudsburg Borough are MS4



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municipalities.

BWA will submit additional comments to the municipalities at the public hearings planned for June, detailing action steps we recommend be included for protection of the important surface and ground water resources of the Project Area.

We recommend inclusion of the Plan for Clean Water as a resource for all municipalities and this Plan. See:

<https://brodheadwatershed.org/plan-for-clean-water/>

Please contact BWA at info@brodheadwatershed.org if you have questions or would like to discuss our recommendations further.

Respectfully submitted on behalf of the BWA Board of Directors:

Alexander Jackson, PhD
Executive Director
Brodhead Watershed Association