



Brodhead Watershed Association

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2.10.2022

Pocono Township Planning Commission, Zoning Hearing Board, and Board of Commissioners,

The Brodhead Watershed Association embraces clean renewable energy, and recognizes its importance in protecting the future of our watershed. However, we strongly oppose the Swiftwater Solar land development plan for this site. Upon review, it appears that the amount of earth disturbance, deforestation, and stormwater runoff generated by this proposal will significantly jeopardize the water quality of the Swiftwater & Pocono Creeks. We believe that this site is unsuitable for large scale energy generation.

Our opposition is centered on three tenants;

- 1. The project calls for over 450 acres of forest removal on the top of Bear Mountain.** The project fails to account in any way for the lost value of ecosystem services across the site and through the watershed. This forest is located at the south-eastern face of the Pocono plateau at an important boundary between EPA ecosystems and is centered on a major eastern migratory flyway. It provides an unusually dense ecological haven.
- 2. The project calls for the construction of 15 stormwater basins.** Each basin appears to be designed to exceed their designed capacity simultaneously. The basins to Swiftwater Creek discharge immediately above steep slopes and are an average are 250 feet above the creek. The majority of the site surface is shown to be directed to Swiftwater Creek, The project therefore presents known risks to Swiftwater Creek which is a Exceptional Value (EV) protected stream.
- 3. Pocono Township zoning map shows the site as "Recreational" zoning use, and as such should not, and we believe, does not allow for large scale energy generation use.** Solar Fields of this density and very large scale need to be subject to regional planning. In the Northeast, solar fields of this size in forests are both new and rare.

There are important ecological reasons to support sustainable energy generation in Pennsylvania and the Nation. Many types of sites should be seriously considered for solar fields. But all potential sites are not equal. The Swiftwater Solar project would destroy important habitat and present a known threat immediately above one of the most significant tributaries in the Brodhead Watershed. This is the wrong site for a 450-acre solar field.

Alexander Jackson, PhD
Executive Director
On Behalf of the Board of Directors