



**Brodhead Watershed Association**

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4/14/22

The Brodhead Watershed Association (BWA) is a non-profit organization that works to protect the water quality and quantity throughout the Brodhead Watershed. We educate, advocate and work collaborative for clean and abundant water. The Brodhead watershed is a 311 square mile watershed in eastern Monroe County. The entire proposed project (SR0080 Section 17M) impacts tributaries to or on the Brodhead Creek itself. BWA comments pertain to options 2B and 2D, while acknowledging that the no-build option is a possibility.

While BWA appreciates the length of the EA report and supplemental documentation, BWA is of the opinion that a complete Environmental Impact Statement (EIS) is necessary for a project of this magnitude. The content of the submitted EA report is woefully inadequate or a project of this scope.

Here's an example of a prior project in Monroe County where an EIS was important. Marshalls Creek bypass. In the 1990s an EIS proved that there were two rare fish species of the shiner lineage. The project proceeded, but in the correct fashion so that no impact occurred to these rare fish.

In response to specific sections of the EA, pages 57-58 itemize 4.6 miles of streams in this project area; 9.2 miles of streambank. With recommended 150-foot buffers that equates to over 83 acres of "active river area", and over 5 miles of wetlands. These tributaries are crucial to the entire watershed. They designated as High quality (HQ) Cold Water Fishes (CWF). This is among the best water quality in the state of Pennsylvania.

Of particular concern is the first two paragraphs of Page 62. This identifies stream and wetland mitigation. "There are no potentially suitable wetland mitigation sites within or immediately adjacent to the API. The project team is looking at potential offsite wetland mitigation sites within the Delaware River Watershed" These are unacceptable concepts. If mitigation is required, it must occur within the same sub watershed and upstream, if necessary. The taking of our natural resources cannot be offset by some downstream project in some other community.

An omission from this report is that the two affected municipalities (Stroudsburg Borough and Stroud Township) are MS4 municipalities. Their MS4 permit requirements as well as PRPs should be considered in parallel with this project and coordination between PennDOT and municipalities should occur for both permit compliance and the improvement of stormwater.

Alexander Jackson, PhD  
Executive Director  
Brodhead Watershed Association