NOVEMBER 14, 2007 PUBLIC HEARING ON WATER QUALITY MANAGEMENT PERMIT NO. 4507404 Pocono Mountain Swiftwater Intermediate School – 7 PM

Good evening. I am Dr. Frank Herting, a resident of Stroud Township, in the Pocono watershed.

My professional career was spent in the field of education in Pennsylvania and New Jersey, retiring after 35 years in 1991, the final 22 years as Superintendent of Schools.

My childhood summers were spent on my grandfather's farm in Bartonsville. Prior to farming my grandfather was a sawyer at his family's wood turning mill, at a site on the Pocono Creek now covered over by I-80, under the route 33 overpass (Exit 302). While I have many memories of times in my youth spent swimming, fishing and wandering the Pocono Creek before I-80, the stream today is but a shadow of a once beautiful watercourse.

Since my retirement I have given a lot of time in service to the community through Rotary Club, the Stroud Township Planning Commission and BWA, to name a few examples. I also hold the elected office of Auditor in Stroud Township. How Monroe County and the Poconos meet the challenges and opportunities of the growth pressures on them is very important to me. My greatest concern is how we can manage growth responsibly while preserving and protecting our precious water resources.

For the past several years I have served as a public representative to an important project in the Pocono watershed. I speak of the US Environmental Protection Agency funded "Sustainable Watershed Planning" pilot project in the Pocono watershed. This \$259,000 project is a science based process designed to get a clear understanding of how we can develop and still protect creeks and streams.

I will be the first to admit that some of the hydrologic science is beyond my understanding, but the conclusions are not. For example, USGS and EPA have modeled stream flow based on current land use conditions and at built-out conditions (when all land is developed under current zoning). The prediction is that daily base flow in the Pocono Creek will decrease 31%. The prediction, also, (which we can see happening already), is that high flows (floods) will be higher and low flows, lower.

Low base flows in our streams will result from lower groundwater levels as groundwater recharge will decline. As you know, base flow in streams – the water in the creek when it hasn't rained recently – comes from groundwater. Those of us on private wells need to be concerned about how lowered groundwater levels will affect us personally.

But what concerns me most about the Pocono sewer project is that the sewer project is continuing with no discernible attention paid to the findings from the EPA study. And what concerns me about the EPA Sustainable Watershed Planning project is that \$259,000 will have been spent to no avail – planning is being conducted by sewer

engineers independently, rather than cooperatively with science, land use and water experts. Not using the tools that EPA is spending our federal dollars to develop for us shows nothing short of obstinacy and ignorance.

So, now comes a project that will export 2 million gallons per day from the Pocono watershed and pump it over the watershed divide to the Brodhead Creek. Yes, 1.6 million gallons per day will be imported from the Brodhead Creek, but of that, 550,000 gallons per day will be used by Sanofi-Pasteur and discharged in the Paradise watershed, either in the Swiftwater Creek or on land in the Swiftwater watershed. That means that only 1 million gallons per day of the exported flow will come from the Brodhead. The remaining 1 million gallons per day will come from wells in the Pocono watershed.

I urge the DEP, the sewer project sponsors and their clients to learn about the EPA study, learn how we can grow thoughtfully, and plan a waste water project that will keep Pocono watershed water in the watershed, hopefully close to the headwaters where it will recharge the headwater tributaries that feed Pocono Creek.

Surely, sanofi-Pasteur, having played such a prominent role in the field of preventative medicine, and with its enormous wealth of scientific expertise, can set the example by providing leadership in achieving the protection of our most precious water resources.