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Board Members:

- Bob Arnold
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- Charles Cravotta
- Tom Embich
- Stephanie Harmon
- Ann Lasky
- Ben Miller
- Jack Stouffer
- Mike Willeman



1/2/2018

Pennsylvania Department of Environmental Resources
Southcentral Regional Office
Attention Thomas J Filip III, PE,
909 Elmerton Avenue
Harrisburg PA 17110-8200

Re: Water Allocations DEP File #WA 22-1038A
PWS ID #7220017
Pennsylvania American Water
0.8 MGD from City of Lebanon Authority Annville
Township, Dauphin County

The Swatara Watershed works every day to attain Clean Water in the Swatara Creek. Therefore, we appreciate the opportunity to comment on American Water Company's application for an additional 800,000 MGD from the Lebanon Water Authority.

After contacting the Lebanon Water Authority for input, SWA learned that they may not have known about this application. In fact, they are at the point where they too are in need of additional water supply.

That being said, SWA acknowledges and understands that our population has grown. Lebanon County alone is at a population of 140,000.

It's hard to think about a drought when we've had over 75 inches of rain, a record setting year in Lebanon County. Conversely, we are aware of studies warning us that without additional water supply, a drought will devastate our communities. Therefore, we respectfully request that no more money is spent on additional studies.

SWA is also aware that in the western part of the United States, over withdrawal of water has dried up rivers.

Even though SRBC must approve withdrawals over 10,000GPD, withdrawal for hydraulic fracturing seem to go unaddressed in plans.

Some of the suggested solutions in the Susquehanna River Basin & other studies include:

1. Utilize **groundwater**, but contamination is a negative factor;
2. Raise the level of the **Christian E Seigrist Reservoir**, but land is being subdivided for sale;
3. Implement mandatory **Conservation measures**, and replace aging infrastructure (pipes), which is always a good idea;
4. Secure withdrawal from **quarries**, but they consist of “hard water” that would need additional treatment, and
 - a. Cornwall Iron Ore Pit has a very low recharge rate, would change the flow and destroy pipes, and is owned by Elizabethtown Borough with a large draw down for an emergency taking years for recovery, therefore not feasible per the SRBC Water Supply Study of the Swatara Creek August 2003;
 - b. Memorial Lake where volume would not meet shortages, therefore not feasible;
 - c. Sweet Arrow Lake where volume would not meet shortages, therefore not feasible;
 - d. The Rexmont Dam was breached.
5. Dam the Swatara Creek on the south end of Swatara State Park, but the Swatara is a cold water fishery with acid mine drainage impairment. Per Lebanon County Comprehensive Plan:
 - a. Swatara Creek Mill Creek to Proposed Swatara Gap Dam is a Cold-Water Fishery
 - b. Swatara Creek Main stem, proposed Swatara Gap Dam to mouth is a Warm-Water Fishery
6. Dam Manada Creek at Route 443 west of Fort Indiantown Gap, but lead in exploded ordnance may leach into the water;
7. Purchase of water from other water companies at a time when they too will need additional water supply is not feasible.

In closing SWA respectfully requests that we spend no more money on additional studies. Instead, we suggest that, even if they have to file individual applications, American Water Company and Lebanon Water Authority work together on a joint strategy to benefit both entities, share the cost, and ensure an adequate supply of Clean Water for this and future generations.

Sincerely and Respectfully,
Swatara Watershed Association

Jo Ellen Litz, president

Addendum attached.

ADDENDUM to Swatara Watershed Association comments:

SRBC is charged to:

- Coordinate the planning and management of the water resources of the basin in accordance with the requirements of the Compact and the Comprehensive Plan; communicate with and listen to the concerns of the water use stakeholders and their elected representatives; educate the public about the water resources of the basin.
- Prevent the loss of life and significantly reduce future damages from floods within the basin through an integrated system of structural and nonstructural flood damage reduction measures.
- **Mitigate the adverse impacts of drought conditions on water users and the environment.**
- Control water pollution and excess nutrient runoff sufficiently to maintain and **establish water quality capable of supporting multiple purpose uses for public water supply, recreation, fish and wildlife, agriculture, industry and other such uses.**
- Restore native migratory fishes to the Susquehanna River System. Remove obstacles to the movement of migratory and indigenous fishes.
- **Insure an adequate supply of water for all users.**
- **Inventory and store relevant water resource management data in a readily retrievable and usable form .**

Quotes from the Lebanon County Comprehensive Plan:

Lebanon County is part of the Lower Susquehanna Regional Water Resource Committee, which is one of the six statewide regional committees for the Water Resource Planning Act. This committee has discussed county and regional issues and identified four priorities for the region:

- An **inventory of water resource supply** (sources, geologic influences, and quantity and quality issues) and demand (current and projected consumption rates by use, critical water planning areas, **impacts of flood and drought conditions on demand**); development of a water budget for each watershed
- **Promotion of water resource conservation, including wise and efficient use, water re-use practices, and protection of critical water bodies and functions**
- **Unification of water resource management initiatives via intergovernmental coordination (communication, data collection and sharing, and regulatory linkages), regional planning and advancement of priorities, and promotion of water resource stewardship.**

Lebanon County submitted several county-specific issues for consideration at the regional level. In Lebanon County, the following issues were raised: **Determination of water uses requiring statewide priority, fee structure for non-priority uses, on-site storage options during drought and flooding crises.**

Other concerns noted by the Lower Susquehanna Regional Water Resource Committee though not thoroughly addressed by the regional priorities include:

- **The need for consistency between plans for expansion of water supply service areas and local comprehensive planning**
- The lack of funding for mandated water supply planning
- Lack of regulation of private wells; while on-lot septic receives attention, on-lot wells receive little attention
- The complexity of water quality protection when pollution comes from multiple sources.