

Dear Mr. Arway - I am writing to let you know that Big Spring Watershed has submitted the comments quoted below to DEP with respect to the subject document. The comments were written by longtime member Keith Clinton, and approved by our board of directors. On behalf of our association, I want to thank you for your constant efforts to bring public awareness and spur regulatory response to the water quality issues of the Susquehanna watershed. We consider the situation an embarrassment to the Commonwealth, one that is long overdue to be addressed in a meaningful manner before it becomes a public health crisis. You can count on our continued support.

I also want to let you know that we continue to be encouraged by what appears to be the continued recovery of brook trout populations in the project areas of Big Spring Creek. Several of us were able to observe the recent survey, and were impressed with what appeared to be an increase in brook trout numbers in all size classes. Good work all around!

Best Regards,
Tom Smithwick
President,
Big Spring Watershed Association

<<<<Big Spring is a tributary spring creek that flows into the Conodoguinet Creek, which empties to the Susquehanna River at Camp Hill, across from the city of Harrisburg, Pennsylvania. The board members of the Big Spring Watershed Association wish to express concern at the current level of effort produced by the Pennsylvania Department of Environmental Protection in recognizing the Susquehanna River as impaired, as well as the agencies lagging efforts to clean up the river, particularly as it refers to nutrient overloading within the watershed.

While it is apparent that the PADEP is conducting numerous studies looking at a host of pollutant contributors to the Susquehanna, it has fallen behind in meeting deadlines to reduce nitrates, phosphates, and to a lesser degree, sediments, as established in 2010 by the EPA environmental cleanup plan. These pollutants represent a major concern to the health of the Susquehanna River, and ultimately that of the Chesapeake Bay. Although PADEP is showcasing efforts by further listing additional tributary streams as impaired, this does not answer the question of getting the Susquehanna River to reduced nutrient levels as required by EPA.

The Big Spring Watershed Association would like to applaud John Arway, Director of the Pennsylvania Fish and Boat Commission, regarding that agencies efforts at asking the Pennsylvania Department of Environmental Protection to recognize the Susquehanna River as impaired, as well as the effect water pollution is having upon its fishes.

The following reflects media highlights regarding efforts to reduce nutrients within the Susquehanna watershed. Reducing TMDL's to required levels as established in the 2010 EPA

environmental cleanup plan, as well as listing the Susquehanna River as impaired, which ultimately effects the health of the Chesapeake Bay, concerns the Big Spring Watershed Association.

According to comments form the Bay Journal June 17, 2016

"The EPA in 2010 established a Baywide cleanup plan, known as a Total Maximum Daily Load, that established annual limits on the amount of nitrogen, phosphorus and sediment — the pollutants primarily responsible for fouling the Chesapeake's water quality."

"Because of the failure of previous cleanup plans to meet deadlines, the EPA and states set a series of two-year goals, known as milestones, to help keep efforts on track toward the interim 2017, and ultimate 2025, goals."

"Nonetheless, William Baker, the bay foundation's president, noted that the previous two years was the third straight milestone period in which Pennsylvania missed its goals."

"It is well past time for Pennsylvania to accelerate its pollution reduction efforts, and EPA must do more to ensure that Pennsylvania obeys the law, he said."

"...Pennsylvania, which Garvin [EPA's Mid-Atlantic regional administrator] said faces a "significant lift" to reach its goals. The state accounts for 89 percent of the 10 million-pound Baywide nitrogen shortfall projected for the end of next year."

EPA gives poor marks to PA. on protecting Chesapeake Bay watershed March 23, 2015
Pittsburgh Post Gazette "For the second time in as many years, Pennsylvania's efforts to reduce agricultural pollution damaging the ecological health of Chesapeake Bay have received failing grades."

"The latest report, released last week by the U.S. Environmental Protection Agency, said the bay pollution control programs of Pennsylvania and Virginia have "significant deficiencies that will have to be rectified if clean-up goals are to be achieved."

"According to the EPA, only about 30 percent of Pennsylvania's 40,000 farms in the Chesapeake Bay watershed comply with existing regulations to limit runoff of animal manure and manure fertilizer into streams and rivers."

"As a result, the EPA report said, the state has failed to meet the 2013 agricultural pollution reduction targets that were established by the EPA's "Chesapeake Clean Water Blueprint. The agency set those targets to speed up reductions of nitrogen, phosphorus and sediment discharges into the bay's tributary rivers and streams...)"

CHESAPEAKE BAY:

Pa. puts its lagging cleanup on a 'pollution diet'
Tiffany Stecker, E&E reporter

Greenwire: Friday, May 13, 2016

"Pennsylvania has lagged behind on commitments to reduce agricultural nitrogen and phosphorus flows to the Chesapeake Bay. U.S. EPA has faulted the state for providing inconsistent oversight and weak funding for programs created to help farmers curb nutrient runoff (Greenwire, March 17, 2015)."

"Last year, EPA temporarily withheld nearly \$3 million in federal funding until state officials could demonstrate a commitment to the bay."

"Then DEP Secretary John Quigley stated, "Clearly, we have not been meeting our targets," Quigley said in a recent interview. "We have to climb out of a hole here."

"Pennsylvania is 16.3 million pounds away from its 2017 agricultural nitrogen goal.

"The state will not meet the targets by next year under the blueprint, Quigley said. It will need an estimated \$4 billion over the next decade to achieve its goals, according to a study from Pennsylvania State University. That's in addition to the \$4 billion that has already been poured into agricultural conservation programs."

from The Baltimore Sun August 15, 2016

"The Keystone State has failed to meet its pollution diet goals in all categories, and it's not hard to see why — it's been lagging behind for years, with agriculture producing the majority of the problem."

"Maryland can't force Pennsylvania farmers to reduce nutrient flows into the Susquehanna River, but the EPA can (and probably should if Harrisburg fails to act soon)."

EPA Chief calls Pennsylvania's Lagging Bay Cleanup "discouraging"
May 27, 2016 by Bay Journal

"Environmental Protection Agency Administrator Gina McCarthy acknowledged this week that Pennsylvania had not done enough to control pollution flowing into the Chesapeake Bay, and said that her agency needed to coordinate with agriculture officials to change the course."

"Pennsylvania's lack of progress is "discouraging at the very least," McCarthy told hundreds of environmental activists, government officials and foundation leaders attending the Choose Clean Water Coalition conference in Annapolis. "I need to talk to the USDA as well," she added, to applause, "because there is work that needs to be done."

"EPA officials and the states involved in the Bay cleanup have known for years that Pennsylvania lagged behind. But a report released last June showed the Keystone State would need to double the number of farm acres under nutrient management and plant seven times as many acres of forest and grass buffers as it did in 2014 to meet its interim reduction targets under EPA's Total Maximum Daily Load pollution diet."

From the Chesapeake Bay Foundations' Pennsylvania Executive Director Harry Campbell summer 2016.

"According to EPA, the Commonwealth came up far short of its 2014-2015 goals for reducing nitrogen and sediment pollution and will miss its 2017 targets for reducing nitrogen and phosphorus runoff that is damaging our waterways."

From the BCTV special report Campbell says, "...But [Pennsylvania] is languishing significantly behind on its efforts to reduce nitrogen and phosphorus pollution, mainly from agricultural runoff sources..." "Pennsylvania needs to take decisive action now, before the EPA does it for the state.">>>>
