

APPENDIX A

PUBLIC COMMENTS

July 16, 2001

Bret Baronak
Indiana County Office of Planning & Development
801 Water Street
Indiana, PA 15701

Dear Bret,

Thank you for allowing us to comment on the Draft River Conservation Plan for the Upper Crooked Creek Watershed. The plan is well written and informative, and provides numerous good management options that are achievable. Two of the biggest obstacles appear to be the clean up of the watershed, whether it be AMD or sewage, and the development of an infrastructure to support the changes (roads, reliable sewage and water supplies). As stated in previous conversations with your office, HRT is willing to work with the Planning Commission and local watershed groups to help put some of these initiatives in place.

We have the following comments on the draft plan:

1. Page 3, first paragraph: Are actual acreages being purchased for easements or are these lands just being designated for agricultural preservation by way of tax incentives (Clean and Green)?
2. Page 3: Under "Water Resources" second paragraph: the third sentence should be reworded.
3. Page 8: All of this information represents the numbers obtained from the 1990 census. Can it be revised to include data from the current 2000 census? Many changes have taken place within the watershed during the last ten years, specifically economic changes with the closing of the large mining operations (R&P), which may have affected the population distribution as well as the age distributions.
4. Page 12 under Transportation Facilities: The statement that the project area has a strong rail system is misleading. There is no passenger service into the area (Johnstown or Altoona is the closest) and the rail lines that are left are mainly used for transportation of coal rather than other commodities.

5. Page 21, last paragraph: The largest single pollution source of McKee Run/Crooked Creek are the two large underground mine seeps from the abandoned Ernest Mine Complex that discharge into McKee Run above and below the Ernest refuse piles. These two seeps together contribute approximately 2.4 million gallons per day into McKee Run, far more than the discharge from the Tanoma borehole.
6. Page 22, second paragraph: In speaking with Jim Panaro, who is the manager of the Air Products' Refuse Site, only approximately 25% of the large refuse pile has been reclaimed as of this time.
7. Page 23: The "pending" mining permit from Amerikohl in Rayne Township is now an active site - the permit number is 32990107.
8. Page 29, third paragraph: As stated above, the two mine seeps from the abandoned Ernest Mine Complex should be included in this discussion.
9. Page 30, second paragraph: It is misleading to state that passive systems require virtually no maintenance. As stated in the one example of a passive system, large amounts of limestone have to be replaced for the system to stay functional. Passive systems also require regular removal of accumulated solids.
10. Page 30, Air Products Ernest Coal Mine Site: As stated in #6, only 25% of the pile has been reclaimed up to the present. There seems to be some confusion as to the pollution associated with the Ernest Refuse piles. The large refuse pile itself does contribute to the poor quality of McKee Run through seeps at the toe of the pile and general stormwater run-off from the pile. However, the major pollution source of McKee Run/Crooked Creek are the two large AMD seeps above and below the refuse pile. These seeps discharge directly from the deep mine below the pile. The seep located above the pile in Ernest also discharges raw sewage that has been discharged into the underground mine.

The refuse taken from the pile by Air Products is processed at Air Products' Cambria Cogeneration Facility located in Ebensburg, not at the Colver Cogeneration Plant.

11. Page 36, first paragraph: Brine from wells in PA contains salinity that is typically 4-5 times greater than seawater (12-30% salt by weight). A further explanation of the constituents of brine may be appropriate rather than "oil pit sludge". Brine contains numerous heavy metals, crude oil, and large quantities of barium and strontium chlorides.

12. Page 36, second paragraph: All pits containing fracuring fluids are required to be lined by the Bureau of Oil & Gas. However, pollution may occur when these pits are disposed of improperly by rupturing the liners or pumping the fluid onto the ground or into a stream.

Again, thank you for involving HRT in the draft stages of the Watershed Plan. Please contact us if we can be of any further assistance.

Sincerely,

Becky Snyder
Operations Manager

Indiana County
Crooked Creek River Conservation Plan
KEY RCP 1997-15 & 7-24
Draft Watershed Conservation Review 7/6/01

General Overall Comment:

- The Executive Summary for the plan should be a stand-alone document, which includes a Management Options Matrix and location map.

I. Project Characteristics:

- ✓ There is no direct reference to "Outstanding or Unique Features", as outlined in the River Conservation Plan. I saw some indirect references to this topic throughout the draft. If in fact there are none, then this is worth mentioning.

II. Issues, Concerns, Constraints, and Opportunities:

- ✓ There is no direct reference to "Issues, Concerns, Constraints, and Opportunities", as outlined in the River Conservation Plan. I saw inclusions of these topics throughout the plan, but I feel that they are not addressed in a direct manner.

III. Land Resources:

- ✓ There is also no mention of "Critical Areas", as outlined in the River Conservation Plan. Again, if in fact there are none, then this is worth mentioning.

IV. Water Resources:

- ✓ There is no reference to "Well Head Protection Areas", as outlined in the River Conservation Plan. Do the various public water suppliers have a wellhead protection plan in place? If not it could be listed in the matrix as a gap and some type of implementation plan could be developed.

V. Biological Resources:

- ✓ There is a reference to the "Aquatic" information being presented in the "Water Resources Section" of the plan. However, it does not reference where in this section?

VI. Management Options:

- ✓ Excellent job on this section!

Memorandum

To: David Zimsky
CC:
Date: 7/9/01
Re: Crooked Creek Rivers Conservation Plan

Dave,

I think the roads systems impact on water quality should be addressed in the plan. If you have any questions please contact me.

Jim Resh

Water quality issue

The sediment loading into the watershed from the Township dirt/gravel roads have a direct impact on water quality. In Washington Township alone there is approximately 55 miles of dirt/gravel roads.

Solution

Educate the townships and provide the resources to implement best management practices that will reduce the roads system's impact on water quality. Some best management practices would include drainage improvements, upgrading stream culverts and improving the driving surface through the use of sized and more durable road aggregates.