

Appendix E:


Letter to Michael Kutney, Department of
Environmental Protection

COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Fish and Boat Commission
Division of Environmental Services

DATE: June 4, 2014

SUBJECT: Application No. 39140301
Geryville Materials, Inc.
Lower Milford Township
Lehigh County

TO: Michael Kutney
Licensed Professional Geologist
Pottsville District Mining Operations

FROM: Steven R. Kepler, Fisheries Biologist 
Division of Environmental Services
Pennsylvania Fish and Boat Commission

A field review was conducted at the subject site, 20 May 2014, to evaluate the current mining proposal and potential impacts to the receiving streams and wetlands. Hosensack Creek is currently listed on the Pennsylvania Fish and Boat Commission (PFBC) Wild Trout List due to the presence of naturally reproducing trout.

The proposed mining area has identified numerous wetlands and streams within the permit boundary. The current delineations were conducted in 2006, and verified in 2007. Wetlands should be re-flagged to determine if additional delineations are required. Since Hosensack Creek is classified as a wild trout stream, all wetlands in and along the floodplains of Hosensack Creek and tributaries would be classified as exceptional value. Additionally, according to the applicant, a Bog Turtle was collected in Wetland J thus emphasizing the exceptional value classification. On Module 6.2 the applicant identifies wetlands within the permit boundary, but fails to identify all wetlands within 1000 feet of the mine permit boundary. Proposed mining at this site will mine well below the surface elevation of the identified wetland complexes, thus impacting the hydrology to the wetland and stream systems. Current piezometer locations should be evaluated to insure they are representative of the associated wetland to accurately identified current hydrologic conditions. Ground and surface water monitoring information needs to also be updated to describe the current conditions. Exhibit 8.6b (1 & 2) shows the mining zone of influence for the groundwater systems extending beneath the identified streams and wetlands.

Silver Spring (Spring 1) contains a perennial stream system that is not correctly identified or any buffer zones established on the stream. Additionally there appears to be wetlands associated with this channel that need correctly identified. A diversion pipe was located within the stream below Silver Spring and apparently feeds a pond/water supply down slope of the diversion. This should be correctly identified.

In summary the PFBC has concerns that current mining proposal will impact streams and wetlands in this area. Due to the extreme sensitivity of the receiving streams and the wild trout populations found in Hosensack Creek, any mining activities need to provide for protection of these resources. The wetlands associated with Hosensack Creek and unnamed tributaries would be classified as exceptional value (EV) and need to be protected accordingly. Previous surveys

conducted for the endangered Bog Turtle (*Glyptemys muhlenbergii*) have identified the species in close proximity to the proposed permit area. The applicant should contact the PFBC, Natural Diversity Section, to determine if additional or updated surveys will be required.

SRK:mr

- c: PFBC - M. Kaufman, C. Urban, K. Gipe, M. Hartle
- PFBC - Bednarchik
- PFBC - WCO
- PGC - Painter