

COMMENT & RESPONSE DOCUMENT

"BASELINE" OF EXISTING WITHDRAWALS OF GREAT LAKES BASIN WATER
USERS FOR THE GREAT LAKES—ST. LAWRENCE RIVER BASIN WATER
RESOURCES COMPACT

DEPARTMENT OF ENVIRONMENTAL PROTECTION
WATER PLANNING OFFICE

JANUARY 2, 2010

The Department received one comment from the Pennsylvania Environmental Council.

Comment: The Pennsylvania Environmental Council (PEC) appreciates the opportunity to comment on the Pennsylvania Department of Environmental Protection's (Department) Summary of Great Lakes Basin Proposed Baselines document, dated October 9, 2009. While PEC is pleased the Department is moving forward with implementation of the Great Lakes-St. Lawrence River Basin Water Resources Compact (Compact), we're concerned that the accuracy and reliability of the data used by the Department to populate the proposed baseline may create future pitfalls as this baseline will inform future conservation strategies and serve as the threshold by which new or increased withdrawals or diversions are measured.

Based upon our recent inquiry to your office, it is our understanding that the data used to create the table was gathered from at least two in-house Department databases and a file review of existing community water systems permittees. After review of the Summary of Great Lakes Basin Proposed Baseline, however it is apparent that this information is far from complete. As explained in the text that accompanies the "Proposed Daily Withdrawal (GPD)" table, the "zero values" indicate that the Department has incomplete or inconclusive data for the identified water user. The validity of a true Baseline is further called into question by virtue of the fact that the Department has inconclusive data for well over 50% of the identified water users.

As a Baseline is the foundation on which the ultimate success of the Compact is built, it is imperative that the data be as accurate as possible. To this end and to operate within the intent of the Compact so that it fulfills its promise, PEC strongly urges the Department to conduct a complete data collection and analysis effort to ensure an accurate baseline and meet Pennsylvania's obligations under the Compact.

Response: The Department appreciates the Pennsylvania Environmental Council's support in this effort and the comments provided. The Department has utilized its internal databases and conducted file reviews to determine the users for the Great Lakes Basin. In addition to issuing the data for public comment, the Department sent letters requesting current data from individual water users in the Great Lakes Basin. Through this effort the Department now has conclusive data from 88% of the identified water users. Based on the responses received, the list of water users and baseline values were adjusted. The Department believes the data provided is accurate and the baseline as developed will allow Pennsylvania to meet its obligations under the Compact.