

## **Forks of the Delaware Trout Unlimited Statement to the Special Zoning Hearing Board Regarding Proposed Wood Avenue Warehouse Project**

Good evening,

My name is Bruce McCutcheon, I am an Easton resident and am here representing the 131 members of the Forks of the Delaware Chapter #482 of Trout Unlimited.

### **About Our Chapter**

Our local Trout Unlimited chapter was founded in 1972 and has served this Lehigh Valley community for over fifty years. Our mission states that we bring together diverse interests to care for and recover streams in the Bushkill Creek and Martins-Jacob watersheds so our children, and their children, can experience the joy of wild and native trout.

Over the decades, our chapter has made significant investment in time, talent, and treasure to:

- Restore degraded streambanks and riparian buffers on Bushkill Creek, Martins Creek, and other local tributaries,
- Partner with local schools to provide environmental education, youth fishing programs, and citizen science opportunities,
- Collaborate with state and municipal agencies along with local conservation groups like Wildlands and Bushkill Creek Conservancies on water quality monitoring, habitat restoration and dam removal projects that improve flood resilience while enhancing aquatic ecosystems, and
- Plant literally hundreds of trees and native vegetation to reduce erosion, filter runoff, and cool local streams.

These efforts reflect our constructive role in this community: we work with municipalities and landowners to achieve solutions that protect our valuable water resources while supporting sustainable growth.

### **Our Stream**

Most of the Bushkill Creek is classified by the state as a High-Quality Cold-Water Fishery. The 1.1 mile stretch of the Bushkill from 0.10 of a mile upstream of Edgewood Avenue downstream to the 13<sup>th</sup> street bridge is designated by the PA Fish and Boat Commission as a Class A Wild Brown Trout stream because it supports a population of naturally produced brown trout of sufficient size and abundance to support a long-term and rewarding sport fishery. Anglers from PA, NJ, NY, DE, MD and beyond come to this area to experience this precious limestone stream and its Catch and Release - Artificial Lure only fishing, which adds impact to the overall economy of our community. The Bushkill is a treasured resource.



## **Our Chapter's Board Has Concerns Specific to the Proposed Warehouse**

Having closely followed the developments and debate surrounding this project and with a deep interest in protecting the Bushkill, our TU chapter has concerns specific to stormwater runoff from the proposed development and its impact on the Bushkill.

Stormwater is not just "rainwater." When it runs off pavement and rooftops, it picks up heat, fine sediments, and pollutants like road salt, oil, solvents, and heavy metals. For coldwater streams, these impacts are severe:

- Warmer runoff pushes stream temperatures above the tolerance range for trout. Just a few degrees can cause stress or even fish kills.
- Sedimentation fills the clean gravel where trout spawn and where aquatic insects, trout food, live.
- Toxic inputs like copper and salt directly impair fish health.
- And perhaps most importantly, flashy storm flows scour streambeds, erode banks, and reduce summer baseflows, the very groundwater-fed flows that keep our trout streams cold.

These impacts are not only ecological problems, they are regulatory compliance issues. Under PA Code 25, Chapter 93, High-Quality Cold Water Fisheries must be protected at their existing quality. Easton's MS4 permit also obligates the City to reduce pollutants, not add to them. If this project's stormwater is not properly managed with infiltration and green infrastructure, not just detention basins, the City risks non-compliance with DEP regulations.

Our chapter urges the Special Zoning Board to demand stormwater management that mimics natural hydrology (infiltration, groundwater recharge, and riparian buffers) not simply detention basins consistent with the PA DEP Post Construction Stormwater Management Manual (PCSM). Without this, the project will irreversibly damage this stream that supports wild trout, recreation, and clean drinking water for the region.

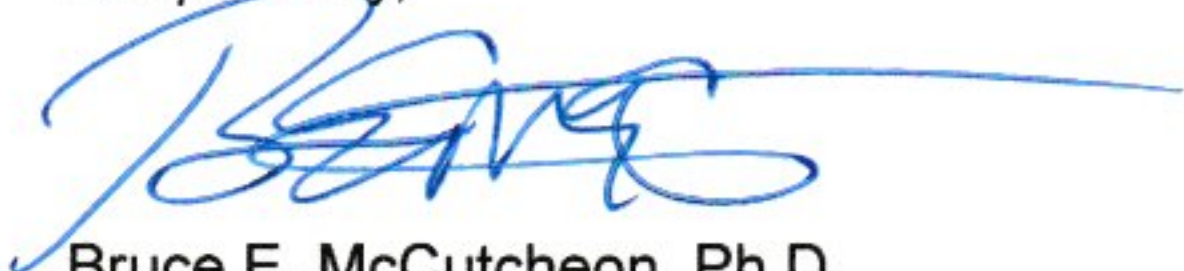
### **Conclusion**

For more than fifty years, the Forks of the Delaware Chapter of Trout Unlimited has worked to restore and protect Easton's waterways through on-the-ground conservation projects, education, and partnerships with municipalities and local conservation groups. We bring this expertise forward in urging the Special Zoning Hearing Board to demand rigorous stormwater controls for the proposed Wood Avenue warehouse to protect the Bushkill.

Failure to do so risks putting Easton out of compliance with its MS4 permit, contrary to DEP's stormwater regulations, and will increase flooding, sedimentation, and thermal pollution in this vital waterway. May we be so bold as to remind that it is this Board's responsibility to protect Easton residents, reduce long-term municipal liability, and safeguard the Bushkill Creek for decades to come.

We thank the Board for its consideration and for upholding the City's legal and environmental responsibilities.

Respectfully,



Bruce E. McCutcheon, Ph.D.

Board Member

Forks of the Delaware Chapter #482

Trout Unlimited