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June 23, 2015

Ms. Lenka Berlin  
U.S. Environmental Protection Agency Region III, 3WP30  
1650 Arch Street  
Philadelphia, PA 19103

RE: Wissahickon Creek Proposed TMDL Comment Period Extension

Dear Ms. Berlin:

The official release of the proposed Wissahickon Creek TMDL stated that comments are required to be postmarked by July 6, 2015. At the EPA public meeting held June 10, 2015 at Temple University Ambler Campus, Ms. MacKnight and Tetra Tech stated that the proposed Total Phosphorus loading limit will result in a concentration limit for the Wissahickon Creek at its discharge into the Schuylkill River of 0.04 mg/L. During this public meeting and previous meetings held on November 14, 2014 and March 13, 2015 representatives of EPA and Tetra Tech stated that the basis for the 0.04 mg/L was the headwaters of a stream in rural West Virginia where there was no human activity. To propose a limit goal for Total Phosphorus based on a virgin, pristine drainage area and hope to achieve the same goal for the Wissahickon Creek, which is located in a heavily urbanized drainage area, will be impossible to achieve with the density of residential, commercial and industrially developed lands.

At the June 10, 2015 public hearing, several items of information EPA and Tetra Tech utilized for the modeling of the Total Phosphorus loading on the main creek and the tributaries were requested so that a thorough understanding of the methodology and computations utilized to determine the loading limits for municipalities could be evaluated. In order to completely review data and test the results established by EPA, an additional ninety (90) days is requested.

We would like to obtain the same data utilized by EPA and Tetra Tech during their evaluations and in their stream modeling software. It was stated that Tetra Tech has been working on the modeling for several years, due to the volume of raw data and the complexity of the software. We are requesting the same respect and consideration to review and evaluate the same data, your assumptions and the resulting proposed conclusions. We would also like to request information regarding any other sites where a very low Total Phosphorous limit was instituted in a stream in which the resulting improvements achieved a significant increase in the IBI and were similar to those assumed for the Wissahickon Creek drainage areas.

Should you have any questions or require any additional information, please contact me at 267-536-1001 or email me at [mlefevre@abington.org](mailto:mlefevre@abington.org).

Sincerely,

Michael LeFevre, Manager  
Township of Abington

pc: George Wrigley, Michael Powers, PE

