

Here is a summary of Shawnee Preservation Society's specific concerns regarding the 2008 Second Amended Shawnee Valley Tentative PRD plan:

A. Scale of Project:

1. Density is a major concern. This project is out of size for the existing community. The number of units should be reduced significantly. This would help to lessen the impact on local roads and reduce the amount of new impervious surfaces. If houses are built on Mosier's Knob, lots should be a minimum of two acres so as not to look like the development at Oakdale on Mt Nebo. Those units do not fit in with the historic, rural feel of the rest of the community.

2. We are very concerned that **the historic village feel of our area be maintained.** Historic homes throughout the cartway/right-of-way are affected. Any roadway changes to Mosier's Knob, Shawnee Church Road, and Hollow Road should be limited and should not involve property loss to those living there. Proposed roadway changes must be detailed very specifically in the plans. The 2007 plan does not adequately address issues regarding "road improvements" throughout the entire PRD, but especially as related to Hollow Road, Mosier's Knob Road, and Shawnee Church Roads. To maintain the rural village ambience, traffic onto these roads should be reduced as much as possible. If houses are built on the Knob, there should be one access road for an entrance and exit. Cars should not be backing out of driveways onto Mosier's Knob Road because of the limited sight distance.

3. We are concerned about **the proposed Wyndham timeshare units.** This project must be scaled down significantly in height and number of units. The units should be no more than two stories in height. Currently, they are planned to be four stories high, which would violate federal and state legislation and impact the viewshed from the Delaware River, the Delaware Water Gap National Recreation Area, and the Appalachian Trail.

4. Groundwater and stormwater issues are a concern. Hydrological studies should be done to examine pre- and post- flow rates and the impact of the PRD on the sensitive wetland habitat in the valley. There should be no water amenity on Mosier's Knob. If any water will be drawn from the local water table (such as to fill a water amenity), a ground water pumping study should be done to determine impact on the water table and existing wells.

5. Disturbance of steep slopes is of concern. There are numerous streams running through the bedrock, which could be disturbed by blasting. This might increase drainage concerns and could irreparably damage the wetland habitat in the valley. Also, there is concern that shock waves would travel through the rock strata and cause damage to surrounding properties. If blasting is planned, pre- and post- seismology studies must be done.

B. Current Ordinances and Regulations:

1. The 2008 plan does not adequately address stormwater management issues.

The plan has not been required to conform to Smithfield Township's complete current Act 167 regulations, only with respect to Best Management Practices. This is unacceptable. This project should conform to all current environmental laws, including the township's current storm water management ordinance.

2. Similarly, the project should conform to all current environmental laws regarding steep slopes including the current Smithfield Township ordinances.

3. Clear cutting of trees is a major concern. This practice greatly damages the natural environment and the rural feel of our community. The project should conform to the township ordinance prohibiting clear cutting.

4. The 2008 plan does not adequately address the Endangered Species Act; this is unacceptable. The areas of Shawnee Creek from what was the open-grate bridge downstream to beyond Shawnee Lake are sensitive wetland habitat and contain endangered bog turtles. This habitat should be protected with a 300' buffer zone around the perimeter of the entire corridor. There should not be a road over the dam at Sun Mountain Lake. This would impede the turtles' ability to range within the wetland corridor. Further, the road will additionally burden the health of the wetland habitat, which is crucial to the survival of this population of bog turtles. There must be fewer units around Shawnee Lake and Sun Mountain Lake to protect the bog turtles and all other endangered species (wildlife and plant life) throughout the PRD on Hollow Road, Mosier's Knob Road and River Road.

5. The 2008 plan ignores issues related to the viewshed of the Delaware Water Gap National Recreation Area and of the Delaware River as protected under the Wild & Scenic Rivers Act; this is unacceptable.

C. Sale of Land for Easement/Protection:

1. Mosier's Knob from River Road to Hollow Road should be sold for easement/protection and turned over to National Park Service to protect the Knob's historic and scenic beauty. This is important to protect the viewsheds from the Delaware River, The Delaware Water Gap National Recreation Area, and the Appalachian Trail as well as reduce runoff to the Shawnee Creek watershed which would negatively impact the wetland habitat and the species living there.

2. The current plan only protects bog turtles in one isolated area. As previously stated, the habitat is much larger and bog turtles require corridors of protection. There needs to be collaboration with the Fish and Wildlife Service and The Nature Conservancy to protect the wetland and upland areas that are important to the survival of this endangered species.

3. The Cherry Valley National Wildlife Refuge study borders our area. As part of the ongoing work for this study, the wetland and upland habitats in Shawnee Valley should be protected from residential and commercial development. Again, cooperation with the Fish and Wildlife Service as well as The Nature Conservancy will be essential.