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**Chambers, Laura M.**

**From:** Brenna Goggin [brenna@delawarenaturesociety.org]  
**Sent:** Friday, November 06, 2009 3:42 PM  
**To:** EP, RegComments  
**Cc:** Jen Mihills; Anne Misak  
**Subject:** Delaware Nature Society Comments for proposed rule-making to PA Code 25 Ch 102

2009 NOV 10 PM 3:36

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Please include comments from the Delaware Nature Society regarding proposed rule-making on 25 PA Code Ch. 102: Erosion and Sediment Control and Stormwater Management in the record.

Please feel free to contact me if you have any questions or need additional information.

Thank you for your consideration

***Brenna Goggin***

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**TO:** Pennsylvania Environmental Quality Board

**FROM:** Brenna Goggin, Environmental Advocate  
Jennifer Mihills, Associate Director, Natural Resources Conservation

**DATE:** November 5, 2009

**SUBJECT:** Proposed Rule-making on 25 PA. Code  
Ch. 102: Erosion and Sediment Control and Stormwater Management

The Delaware Nature Society joined together with more than 130 regional conservation organizations and dozens of legislators in support of the Pennsylvania Campaign for Clean Water's "Buffers 100" initiative. We are disappointed to learn that the proposed revisions to Chapter 102 do not include the goals of "Buffers 100."

The Delaware Nature Society is a private, non-profit, membership, organization with more than 8,000 members throughout Delaware and the surrounding region. We work to foster understanding, appreciation, and enjoyment of the natural world through education, advocacy, and preservation. As a downstream neighbor, Delawareans have a vested interest in Pennsylvania water quality regulations, such as "Buffers 100." Three of Delaware's sources of drinking water, the Brandywine Creek, Red Clay Creek, and White Clay Creek, originate in Pennsylvania.

The "Buffers 100" Initiative calls for a 100 foot forested buffer for all streams, with added protections for first and second order streams, as well as waterways classified as high quality or exceptional value. Forested buffers are critical to the health of streams. These buffers filter pollutants; reduce erosion and stabilize streambanks; lessen the velocity and force of floodwaters; provide habitat for a diversity of wildlife; and shade streams protecting cold-water fisheries and limiting algal growth. The Delaware Nature Society has worked with our members, local school groups, and members of the community to protect our water quality by installing riparian buffers along our stream banks.

Again, the Delaware Nature Society strongly supports the goals of the "Buffers 100" initiative and urges you to incorporate those provisions into the revised Chapter 102 language.

Thank you for the opportunity to comment.