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Chambers, Laura M.

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From: William Quinn [abingph@verizon.net]
Sent: Saturday, November 07, 2009 4:45 PM
To: EP, RegComments
Subject: Comments on 25 Pennsylvania. CODE CH. 102

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INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: PROPOSED RULEMAKING on 25 Pennsylvania. CODE CH. 102: Erosion and Sediment Control and Stormwater Management

Pennsylvania has over 83,000 miles of streams. This is an important resource and we need to protect it! This is why the regulations for erosion and sediment control and stormwater management need to include a mandatory stream buffers program, not a voluntary one. Pennsylvania's streams cannot afford more pollution and runoff, and we cannot afford increased flooding and drinking water treatment costs.

Pennsylvania should require forested buffers of at least 100 feet on both sides of every stream in our state, with 150 feet on small headwater streams and 300 feet on Exceptional Value and High Quality streams.

Forested Buffers are good for the environment and the economy. Buffers will reduce pollution of our streams, limit erosion of stream banks, improve habitat for fish and keep streams cooler. They will also increase property values for nearby properties, and cut stormwater management costs and drinking water treatment costs. And they will reduce damage from flooding, which costs \$ 6 billion a year. Many municipalities in Pennsylvania already require at least 100 foot buffers, making development better for our communities and the environment.

Also, DEP should remove the Permit by Rule proposal in the draft Chapter 102 regulations. It is a terrible idea that will reduce oversight of stormwater plans, allowing bad plans to be implemented until it is too late to fix them. The recent experience with a similar program in the Marcellus shale permitting program demonstrates that relying on engineers to submit good quality plans is a false hope.

Sincerely,

Mr. William Quinn
33 E. Abington Avenue
Philadelphia, PA 19118