



White Clay Creek, National Wild & Scenic River

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Watershed Management Committee

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INDEPENDENT REGULATORY
REVIEW COMMISSION

www.whiteclay.org / riveradministrator@whiteclay.org

November 4, 2009

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Environmental Quality Board
P. O. Box 8477
Harrisburg, PA 17105

NOV 10 2009

ENVIRONMENTAL QUALITY BOARD

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

The White Clay Creek Watershed Management Committee appreciates DEP's interest in a stream buffer program but urge you to strengthen the current proposal to include a wider stream buffer on all streams and to require technical review of all stormwater management plans. Trees, and in particular stream buffers, are the cheapest and BEST Management Practice for reducing water pollution and habitat degradation resulting from stormwater.

Research at the Stroud Water Research Center (among others sources) supports forested buffers of at least 100 feet on both sides of every stream in our state, with wider buffer recommendations for more vulnerable reaches: 150 feet for small headwater streams and 300 feet on Exceptional Value and High Quality streams. In addition to protecting streams, forested stream buffers reduce stormwater management, damage from flooding, and drinking water treatment costs.

DEP should also continue to review stormwater plans to insure that they meet the standards of the Clean Water Act and do not degrade the quality of the streams of the Commonwealth. An expedited permit review process, puts all streams at risk, especially High Quality and Impaired watersheds.

Like most all states across the nation, Pennsylvania has a high proportion of impaired waterways. Adequate stream buffers and assurance of adequate stormwater plans are needed to bring about the improvements in stream health and flooding and drinking water protection that the public desires. Please support these revisions.

Sincerely,

Linda Stapleford
River Administrator