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ENVIRONMENTAL QUALITY BOARD

November 25, 2009

Honorable John Hanger, Secretary Pennsylvania Department of Environmental Protection, and Chairman, Environmental Quality Board 16th Floor Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17105-2063

Dear Secretary Hanger:

On behalf of the Greater Philadelphia Chamber of Commerce (GPCC), representing 5000 businesses and organizations throughout southeastern Pennsylvania, I am writing to express concerns regarding the proposed revisions to the 25 PA Code Chapter 102 regulations.

In recent weeks, we have been approached by Chamber members in southeastern Pennsylvania who believe that the new proposed regulations will impact the progress of many individual development projects and further threaten an already stressed local construction industry. Planners and managers are concerned that the new procedures will result in lengthier approval processes, increased construction and design costs, and the denial of permit extensions. Existing projects with future phases could also suffer under the new regulations.

Like state and local governments, businesses and industries are struggling through this unprecedented economic downturn. Companies are working very hard to maintain both operational and employment levels. The additional burdens that accompany the proposed regulations could threaten the financial viability of specific projects, as well as some industry employers, including builders, developers, lenders, and suppliers.

The Greater Philadelphia Chamber of Commerce is dedicated to promoting growth and economic development, and advocating for sound public policy. On behalf of our members, especially those who are direct stakeholders in this process, we thank you for your consideration of our comments and urge your cautious review of the Proposed 25 Pa. Code Chapter 102 Rulemaking.

Sincerely,

Joseph W. Mahoney Gr. **Executive Vice President**

cc: Honorable Mary Jo White, Chair

Honorable Raphael J. Musto, Minority Chair

Honorable Camille "Bud" George, Chairman

Honorable Scott E. Hutchinson, Minority Chairman