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November 17, 2009
14 Killdeer Lane
Downingtown, PA 19335

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Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

ENVIRONMENTAL QUALITY BOARD

Reference: Chapter 102 Proposed Rulemaking

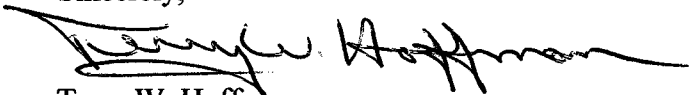
I am a professional forester and am a Certified Forester by the Society of American Foresters, CF#1230. I have 40 years experience with the U.S. Forest Service and 4 years as a part-time consultant doing work in Pennsylvania.

I am a strong supporter of forested riparian buffers and the elimination of livestock grazing, row cropping and development within the flood plain of our streams and rivers in Pennsylvania. I can support buffers of 100 feet on streams, and 150 feet on impaired, EV or HQ watersheds. However, there are some requirements proposed that I cannot support.

First, forest management is not a major cause of water quality degradation. The primary problems come from mine drainage, agriculture and urban runoff. The proposal before the Board would limit timber harvesting within the outer half of the buffer. This would be a mistake. We need to manage all the way to the bank when there is an approved forest stewardship plan and 60% of the canopy cover is maintained. This is necessary to maintain the health and vigor of the forest, to control exotic invasive species, and to improve wildlife habitat. It also allows the landowner to manage the stand for carbon sequestration values, which will soon be available. In summary, if a landowner can make money and protect the water quality, this should be encouraged. We must be good stewards of the land and water, and we can only do this through active management. Benign neglect is not good management.

Secondly, there is a call for additional planning for projects requiring E&S permits. Foresters, though not licensed in the state, have been preparing E&S permits for some time and doing an excellent job. This provision for foresters to continue preparing E&S permits must be retained, licensed or not.

Sincerely,



Terry W. Hoffman
Consulting Forester.

INDEPENDENT REGULATORY
COMMISSION

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