



Adams County Conservation District

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November 25, 2009

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

RECEIVED

DEC - 7 REC'D

RE: Adams County Conservation District Comments
Proposed Rulemaking – 25 Pa. Code Ch. 102
39 Pa.B. 5131, August 29, 2009

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Environmental Quality Board members:

At the October 22, 2009 regular meeting of the Adams County Conservation District Board of Directors, a motion was made and approved to forward the following comments in response to a Public Notice of proposed rulemaking relating to 25 Pa. Code Chapter 102 (Erosion and Sediment Control and Stormwater Management.)

General Comments

Unfortunately, we feel that the proposed regulations and especially the stormwater component are cumbersome and difficult to understand and will have little if any impact to improving water quality. We are not in favor of combining stormwater by regulation to the Chapter 102 Erosion and Sediment Control regulations. The proposed regulations are difficult to understand and read. For example, in reading 102.8 PCSM requirements there are an a and b then (1 through 9) then (c, d, e and f) then (1 through 16,) then (g) then 1 and 2 then i and ii, then (3), then i and ii then (4, 5 and 6) then (h, i, j, k, and l) then (1 and 2) and finally (m and n). The above example is 7 pages long and it is very difficult to follow. The existing Chapter 102 regulations are shorter and much easier to read and understand.

In general, how Pennsylvania addresses stormwater and its management is convoluted and ineffective. With four different levels of government, federal, state, county and municipal each having a significant role through multiple laws and regulations there is inconsistency, frustration, unnecessary expense and occasionally property damage. In Adams County, many of our stormwater problems go unresolved. Ultimately, even with all four levels of government involved, stormwater still remains a major source of water pollution in Pennsylvania. Each of the four units of government needs to collaborate with the other levels of government. We do not see this occurring in Pennsylvania and so our stormwater problems will continue to persist.

On November 24, 2009, we were informed that the federal government, through the EPA, is proposing to establish new guidelines (regulations) for effluent limitations and new source performance standards to control the discharge of pollutants from construction sites. It's

unclear how this will affect Pennsylvania's stormwater management program except that it will continue to add more inconsistency, frustration, confusion and expense.

An effort needs to be made to have consistency between what is required to satisfy those watersheds that have approved Act 167 plans with the requirements for Phase II NPDES stormwater requirements so that only a single set of plans would be needed. In Adams County, we were excited to be starting our Phase II Act 167 plan which would have had the entire county under a single plan. Unfortunately, funding for the Act 167 program was eliminated. Consequently, we will have the Monocacy portion or approximately half of Adams County under the Act 167 plan and the Susquehanna portion of Adams County under the Phase II NPDES stormwater requirements.

We have also been working with several municipal engineers to have them test using the Department's PCSM stormwater checklist requirements into their own municipal stormwater checklist in order to eliminate a second submission with different standards and specifications. Due to the economic impacts of the recession, very few plans have been submitted in order to test the idea.

We are concerned about the role of conservation districts and stormwater management and would hope that the Department has already begun thinking about how it will revise our existing delegation agreements if these regulations become promulgated. We would encourage the Department to form a committee composed of District staff that work with both the technical and administrative elements of the program to begin working on detailing the role and functions of Districts in both the standard E and S/NPDES delegation agreement as well as with the Post Construction Stormwater Management delegation agreement.

Unlike erosion and sediment control which only occurs during construction and is for a relatively short period of time, stormwater is forever. Presently, stormwater is the single largest type of complaint that we receive but we have limited success in resolving most of the complaints. If stormwater is added to Chapter 102, we fear spending even more staff time with no greater ability in protecting water resources. Unfortunately, unless some of the existing stormwater laws are repealed, our stormwater problems will continue. We can not stress this point enough. Surely, one of the other 49 states in the U. S., perhaps one that also has the distinction of being a commonwealth, has figured out how to coordinate the four different levels of government and is managing their stormwater program far more effectively than Pennsylvania. I would encourage that some staff time and research be done to evaluate what the other states are doing to see if we might be able to mimic what is working in another state. If we were to find a model that works, the next challenge would be how to resolve all of our existing and conflicting laws and regulations and then figure out how to get each of the levels of government and the citizens they represent to agree. This is a monumental challenge but absolutely necessary to effectively managing stormwater.

Few Districts have a P. E. on staff. The existing program requirements as well as the Department's uncertainty with clearly defining its expectations especially related to PCSM, causes a tremendous amount of confusion and inconsistency in place amongst and between conservation districts, the six DEP regional offices and DEP's Central Office as well as with the regulated community. For a number of years within the southcentral region of the state, both District Managers and District technicians regularly get together to minimize some of these inconsistencies.

Due to the complexities of the program, increasing program costs and requirements, combined with shrinking staffing and funding shortfalls, we often wonder if we are really making a difference in protecting Adams County's water resources. If we aren't and we turn the delegated program back to DEP to administer, in the end, the local citizens lose and ultimately Pennsylvania's water resources will also suffer.

Instead of making the program even more complicated, we would suggest to keep the program and the regulations as they are and to concentrate the Department's and the Districts' efforts to improving the quality of submissions of the NOI's, the PCSM plans and to improve the inconsistency that presently exists across the state.

Through our correspondence of January 20, 2009 to Secretary Hangar, nine southcentral Districts provided suggestions when we expressed concerns about the proposed Permit by Rule (PBR) proposal. The concerns that we expressed still remain. In today's poor economic climate, when state and county governments are unable to sustain their present employee base, we do not see this as a good time to propose such dramatic changes to the program. It would be far better to focus our limited resources on doing a superior job with the E and S portion of the program including the agricultural portion.

We do acknowledge and appreciate the additional language of 102.4 especially with Animal Concentration Areas as we feel this will be an improvement in our ability to address agricultural E and S problems.

Comments on the Proposed Regulations

102.1. Definitions

BMPs - The BMP definition in Chapter 102 and Chapter 92 should be identical or more consistent.

Conservation Plan - The conservation plan should be a written plan.

(ii) The Conservation Plan shall include a schedule for the implementation of the BMPs. The length of time that one has to implement the plan should be defined. If one has a schedule of BMPs to be implemented and a pollution event occurs, would the person be in or out of compliance?

E and S Plan - This plan should also be written. Does an E and S plan need to be approved by a District or by DEP?

Intermittent stream - We would recommend deleting this definition and instead adding the existing definition of Waters of this Commonwealth as found in the existing 102 regulations.

Licensed professional - You might consider adding licensed foresters to this definition.

NOI - Notice of Intent - Delete "or conservation district" as the NOI is a DEP form.

NPDES Permit for Stormwater Discharges Associated With Construction Activities - (i)
Delete "surface waters of this Commonwealth" and replace it with "Waters of this Commonwealth."

(ii) The term a "common plan of development" needs to be defined.

Nondischarge alternative - The use of the terms "cost effective and reasonable" is very subjective and will lead to confusion and uncertainty throughout the proposed regulations.

Normal pool elevation - (ii) We do not know what "structurally regulated bodies of water" are. If this term is from Chapter 105 regulations, than it should be defined as such.

Perennial stream - Delete this definition and use the definition for "Waters of this Commonwealth" throughout these proposed regulations.

Post construction stormwater - The definition is needed.

PCSM - Postconstruction stormwater management - This term needs to be defined.

Project site - The rest of the definition for this term is missing.

ROC - Registration of coverage for the permit-by rule - This term needs to be defined.

Riparian forest buffer - The terms "predominantly" and "maintained" both need to be defined.

Surface waters – Delete this definition and replace it with "Waters of this Commonwealth."

Additional terms that we feel should be added to the definitions section include the following:

Minimize (102.8) (b) - Presently, this term is not defined and so it is very subjective if and when one minimizes stormwater runoff or volume etc... Perhaps the term needs to be quantified although we admit that this will be difficult to do.

Extent Practicable - This, like minimize is a very subjective term.

Over the life of the project 102.5 (a) (1) We suggest that this phrase should be tied to the submission and acknowledgement of the Notice of Termination (NOT).

The term "**critical stages of construction**" (102.5 (e)) needs to be defined.

Low Impact Development (102.15) We suggest "An environmentally sensitive approach to stormwater management that seeks to manage rainfall using decentralized, small-scale controls that are integrated into a site's landscape features, and which mimic a site's predevelopment hydrology by infiltrating, filtering, storing, evaporating and detaining runoff close to its source."

The term "**clean fill**" should be defined and consistent with other laws and regulations.

Is 102.3 still being reserved and if so, for what?

102.4 (4) – The use of the terms “cost effective and reasonable” are very subjective.

(4) (ii) The 25 % cover is too low. We would suggest a 50% cover instead.

(5, 6 and 7) – In (5 and 6) the term E and S Plan is used while in (7) the term conservation plan is used. If there is any way to simplify the language between an agricultural E and S plan and a conservation plan that would be beneficial. We still find these terms used interchangeably when they may have different definitions depending on their use.

(9) (b) - We would suggest somehow bolding this section or somehow calling it something else so that it is easier to find and stands out. What is (a)?

(9) (2) – What is (i)?

(3) - The program has struggled for years with the use of the terms “trained and experienced.” Presently, neither the Chapter 102 regulations nor the PA Clean Streams Law seem to have any type of legal authority to require any sort of a certification program. Consequently, in Adams County, a large majority of submissions of E and S and PCSM plans and the NOIs are administratively incomplete. A tremendous amount of time and expense is wasted waiting for additional information even before a technical review can occur. Even though the statutory authority may not be there to require some type of certification program, we would encourage the Department to come up with some method of quantifying and defining one’s competence relative to being “trained and experienced.”

There are a number of existing nationwide certification programs including the NICET program as well as the CPESC program amongst others. We would suggest that in some fashion both the preparers of these plans as well as the reviewers of these plans need to be able to prove their competence. The lack of quality of submissions is a state wide issue which if properly addressed would greatly help to speed up and improve the reviews while also increasing the amount of time for District staff to be out in the field doing more field inspections. We would be happy to work with the Department on how to resolve this critical program inadequacy.

Several years ago, the Department offered an Expedited Permit Review process in order to address the backlog of permits waiting to be reviewed predominantly in the NERO. I believe the Department ended the Qualified Consultant process due to a very small number of people being able to meet the program’s requirements. A rigorous training program, with some method of measuring one’s competence, would be a major programmatic improvement that would save people a tremendous amount of time, frustration and money.

(4) Delete...”or conservation district after consultation with the Department,” This would cause unnecessary delays to program implementation.

(5) (i, ii, iii and ix) Each of these items needs to be defined or else revise the numbering sequence.

(xiii)- Additional guidance on evaluating the potential for thermal impacts to surface waters needs to be provided especially when one is reviewing one specific site at a time. In some

fashion, it is critical to be looking at the cumulative thermal impacts to water quality on a watershed basis.

(xiv) Add the language “or a delegated conservation district” after...Unless approved by the Department,”

(8) It would be beneficial to add some language that if a delegated conservation district receives a complaint or is performing a site inspection that the District has the authority to require and charge a fee for its services related to the complaint and inspection.

102.5 - Permit Requirements

(1 and 2) These sections are duplicated.

(3) (d) This section is difficult to understand. If there is any way to simplify the language, that would be beneficial.

(e) (j)- This section should be moved into the appropriate section of 102.4 as it relates to agriculture.

(e) “For earth disturbance activities authorized by a permit under this chapter...” we would recommend adding language that would require operators be added to the permit as a co-permittee prior to the pre-construction meeting.

102.6-Permit applications and fees.

We strongly oppose the Permit – By Rule portion of the proposed regulations and would encourage the Department to withdrawal this portion of the proposed regulations. However, later in our comments, we will comment on the PBR portion of the regulations.

We would encourage the Department to consider a tiered fee approach. We think that it is unfair to charge the same amount to a small permitted site as to a large subdivision. We would suggest those permitted sites from one to five acres that require an NPDES permit to have a fee of \$1,000 and those sites five acres and more to pay \$2,500. In addition, we would suggest that the Department define what the applicant should expect by paying the filing fee.

We are happy to see the added language that the Department will review the adequacy of the fees at least once every three years. We would encourage the Department to work closely with the Districts in order to improve the true costs of running these programs. Presently, if one looks at the amount of variation that exists for program costs as provided by the Districts through the Conservation District Fund Allocation Program (CDFAP), you see a tremendous amount of variation. A number of Districts are not even reporting any costs associated with administering the programs. In addition, there is little guidance from the Department about those costs that the Districts incur while administering the agricultural portion of the program.

(c) **Complete applications or NOI.**

(2 and 3) Please add “or delegated conservation district” after “When the Department...”throughout this section. Use one of these words “incomplete or deficient” instead of the word withdrawn in both of these sections to be more consistent. In (3), we would suggest that you add some language about the District’s E & S fee will also not be refunded.

(5) – We have concerns about the use of the term “approved” when referring to an “approved” PCSM plan. From the 2008 annual 102 data submitted by Districts, approximately 85% of all of the NPDES permits are General permits. Presently, with the exception of that handful of Districts that are administering the PCSM delegation agreement and who are approving the PCSM plan associated with a General NPDES permitted site, all of the other Districts are only doing a cursory administrative review of the PCSM plan. Even though the General NPDES permit has been acknowledged by a District involved with the normal 102/NPDES delegation agreement, we feel that it is misleading for applicants to think that their PCSM plan has gone through a technical review and has been approved when that is not the case. We would encourage the Department to delete the use of the word “approved” relative to PCSM plans when they have not been approved from a technical perspective. We also have some concerns about the role of Districts and our involvement with PCSM plans and if this might not be considered an act of engineering.

Under the existing 102/NPDES delegation agreement, not the PCSM delegation agreement, we have some concerns, if in fact something goes awry from a stormwater perspective on a General NPDES permitted site, if the Department will actually provide us with the indemnification protection that we think that we have. We would encourage the Department, both the Central Office and the 6 Regional offices, along with all of the delegated Districts to provide further training on exactly what the Department is expecting from the Districts with our involvement with PCSM plans. Presently, we feel that there is too much inconsistency and uncertainty across the state which leads to problems.

102.8. PCSM requirements

We find it confusing when the terms “prevent and minimize” are used throughout this section relative to the rate and volume of stormwater runoff. In (8) both words are used implying that the applicant can choose between preventing or minimizing the generation of increased stormwater runoff and pollutants.

(d) Add some language about those Districts that have a PCSM delegation agreement relative to an “approved” PCSM plan.

(e) We have already expressed our concerns about the poor quality of the plans submitted by a person “trained and experienced” in PCSM design methods and techniques.

(f) (1) We would encourage the Department to define “the immediate surrounding area.”

(2) – **“The types, depth, slope, locations and limitations of the soils and geologic formations.”** We are concerned about our poorly drained soils and their inability to meet the two year volume requirements on a consistent basis. Most of our sites do not meet CG -1 requirements.

(6) (h) We feel that there should be no difference between the requirements for PCSM plans in High Quality “and” Exceptional Value watersheds instead of “or.”

(k) ...”Critical stages of implementation” of the approved PCSM plan... needs to be defined.

(m) We think that this additional language is a good idea in regards to who is responsible for the operation and maintenance of a PCSM plan. From a practical standpoint, we have some concerns about how complicated it will be to do this and how much time it will take.

(2) “If required to develop a PCSM plan...” seems to imply that sometimes it is not required. This language should be clarified.

(2 and 3) The first section of both of these sections is not a sentence but a phrase,

Erosion and Sediment Control and Post Construction Stormwater Management BMPs (102.11)

Language should be added somewhere in the E and S portion of the regulations to address spoil and borrow sites.

(2) “**If required to develop a PCSM plan...**” to “**mimic preconstruction stormwater runoff conditions**”... We do not feel that most plan submissions will be able to meet this requirement of mimicking preconstruction stormwater runoff conditions. In addition, we have concerns if the Department will support us when take a position that the plan does not mimic pre-construction runoff conditions.

102.14 Riparian forest buffer requirements

(a) (1) **Riparian forest buffer.** The proposed regulations should define when a riparian forest buffer needs to be done. It will take years for a riparian forested buffer to grow and become established. If the buffer never gets established to protect water quality, will the permit be rescinded? Although we recognize the need and value of riparian forested buffers from a water quality perspective, the amount of time spent determining if the buffer is working properly could get complicated and time consuming.

(i) This requirement should apply to both High Quality and Exceptional Value watersheds.

(4) **Existing buffer composition** - We didn't see subsection (d) to see what the requirements of an existing riparian forest buffer are. “The controlling of noxious weeds and invasive weeds must be removed or controlled to the extent possible.” This is a very subjective determination.

(2) Zones

(2) **Impaired waters.** It is not clear under this section if it matters what portion of a water body is impaired? How will the designation of the entire Pennsylvania portion of the Chesapeake Bay being listed as impaired affect these buffer requirements?

(3) Special protection waters. – The proposed regulations seem to imply the requirement of planting riparian forest buffers without any regard to property boundaries.

(e) Management requirements.

(2) We have concerns about our role in determining compliance with the riparian forest buffer requirements.

(f) Permanent protection of riparian forest buffers. Although we agree with the use of riparian forest buffers we have concerns as to how much time it will take to evaluate access easements, deed restrictions, conservation easement, local ordinance or permit conditions. Will all of these documents be submitted to a District as part of a complete NOI?

(g) Reporting. Who is going to look at all of these data sheets and how much time will it take?

102.15 Permit –by rule for low impact projects with riparian forest buffers.

We strongly oppose the idea of a PBR and would encourage the Department to withdraw this portion of the proposed regulations. We are not in favor of circumventing the existing NPDES permitting process that is presently in place. We have concerns that with the PBR process, there is no technical review involved with the project. Without a technical review of the E and S plan, we can predict significant deficiencies of the plans both E and S and PCSM. As we have already mentioned, the present program has problems with the quality of submissions even while the E and S plans are being reviewed by the delegated districts. The PBR idea will not do anything to protect and improve water quality. Once an applicant has properly submitted the PBR as proposed, we dread the idea of doing an inspection on a PBR permitted site recognizing that no one has done a thorough technical review of the site and project.

(a) Qualifying for coverage. We do not believe that the PBR portion of the proposed Chapter 102 regulations should “supercede any requirements of Chapter 92...” Has the EPA approved the PBR concept as defined by DEP? We would suggest that the Department clarify exactly which section of Chapter 92 is being superceded.

(b) Permit-by-rule exclusions.

(1) Even though we oppose the entire PBR idea, we do not believe that it should apply in any Special Protection watersheds neither High Quality nor Exceptional Value watersheds.

(3) “Lands that are currently contaminated from a spill or release of a hazardous material,”... We have concerns about agricultural lands, especially orchards that have been in production for many years and where high concentrations of heavy metals from the use of previously approved pesticides have been used.

(4) Although we appreciate this language about...” a person who has failed and continues to fail to comply or has shown a lack of ability or intention to comply with a regulation, permit and schedule of compliance or order issued by the Department,” we think that this language

needs additional clarity to define the frequency that this be allowed to continue. We would suggest that the person as described only be given one chance to meet all of the necessary requirements. The individual and the applicant then need to submit the same site through the typical NPDES process. The District would be entitled to keep the proposed \$2,500 filing fee and then be allowed to charge an additional \$2,500 filing fee as is presently being proposed in addition to the E and S fee if it applies.

(2) (ii) – We have already expressed our concerns about how this would work in an impaired watershed.

(3) “The earth disturbance must not exceed 15 acres at a time.” We don’t believe that 15 acres would be a low impact. In addition, there doesn’t seem to be any maximum limit of disturbance as long as it is no more than 15 acres at a given time.

(d) Projects located in High Quality watersheds or watersheds impaired for sediment or stormwater.

(1) **Watersheds.** We don’t believe that the term “non-special protection waters” is defined in Chapter 93.

(2) Public notice

(B) While (B) requires a 30 day written public comment period, it does not explain what, if anything, the applicant is required to do in responding to the written public comments.

(E) “The location of the nearest downstream potable water supply, or a finding that no potable water supply will be affected by the proposed discharge.” Additional guidance needs to be provided by the Department on exactly how an applicant is supposed to prove that no potable water supply will be affected. It would be beneficial to add a definition as to what a potable water supply is.

(g) E & S plan for the permit-by-rule

(1) Site preparation, sensitive area and buffer protection

We would encourage a definition of “sensitive area” to reduce confusion and subjectivity.

(j) Eligibility verification - ...”The registrant may apply for other permit coverage as referenced in this section if coverage under this permit-by-rule is denied.” We suggest the following ...if coverage under this permit-by-rule is denied, “if the ROC is incomplete, inaccurate or if the activity is ineligible for permit-by-rule coverage. Applicants are then required to apply for a General or Individual NPDES permit.”

(2) “An action of the Department or a conservation district denying coverage under this permit-by-rule, or requiring a general or individual NPDES permit...”

We encourage the Department to review Section 11 (2) (c) of the Conservation District Law to make sure there is no inconsistency when any person aggrieved by an action of a district pursuant to 2 Pa. C.S. 105 (relating to local agency law) and what is being proposed in 102. We remember, perhaps in Lebanon County, when a person was aggrieved by an action taken

by the District. The District had to rescind the action taken so that the action taken then became an action of the Department and not an action of the District.

(p) Program audit – We encourage the Department to define when the PBR needs to be audited and suggest that this be done annually.

102.22 Permanent Site stabilization. Add the definition of permanent site stabilization to the definitions section. Language should be added that requires a time frame component such as the determination for attaining stabilization should not be done until at least one growing season has occurred.

102.32 Compliance and enforcement provisions.

(b) “If the Department finds that pollution or a danger of pollution...”

Please review the language in 102.4 to make sure that the same language is being used between an agricultural E and S plan and a conservation plan to avoid any confusion. You might want to consider adding a definition about a Technical Service Provider (TSP) as some TSPs are now developing conservation plans in addition to Districts and NRCS.

102.41 Administration by conservation districts

(a) Somewhere within the regulations, it would be beneficial to explain that there are two separate delegation agreements that Districts have especially with respect to the Districts role with PCSM.

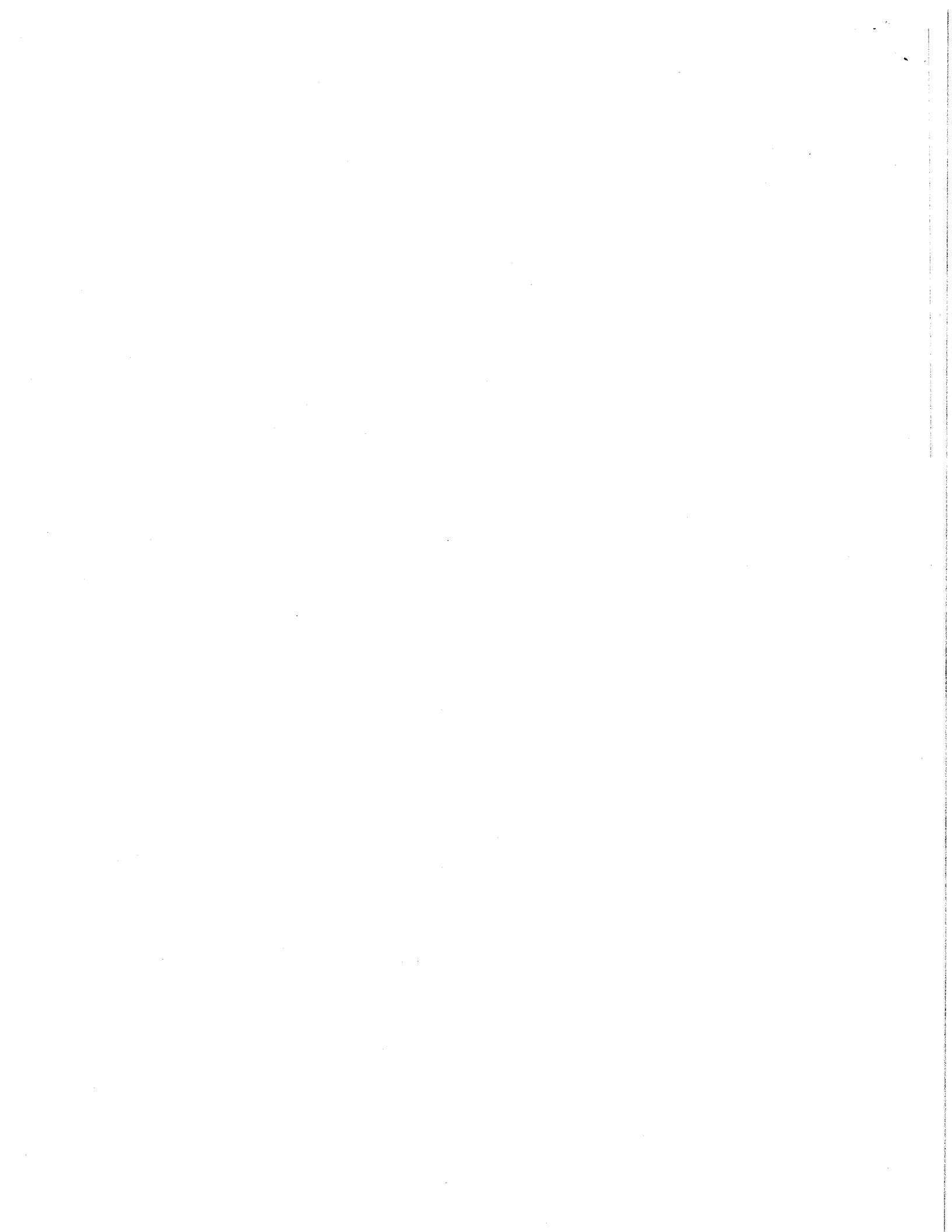
We appreciate the opportunity to offer our comments and concerns on the proposed 102 regulations. We look forward to working with the Department in order to try to make these regulations practical so that we can continue to assist the Department in protecting Pennsylvania’s water resources.

For the Adams County Conservation District Board of Directors,

Laurence Martick

Laurence Martick, District Manager
Adams County Conservation District
670 Old Harrisburg Road, Suite 201
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CC: Susan Marquart and Brenda Shambaugh, PACD
Adams County Conservation District Board of Directors
Secretary John Hanger
Ken Murin, DEP Central Office
Ramez Ziadeh, DEP/SCRO



Chambers, Laura M.

From: Jonathan Rinde [JRinde@mgkflaw.com]
Sent: Monday, November 30, 2009 3:34 PM
To: EP, RegComments
Cc: Murphy, Margaret O; Michael Meloy; Jonathan Rinde
Subject: Comments on the Proposed Amendments to 25 PA. Code Chapter 102

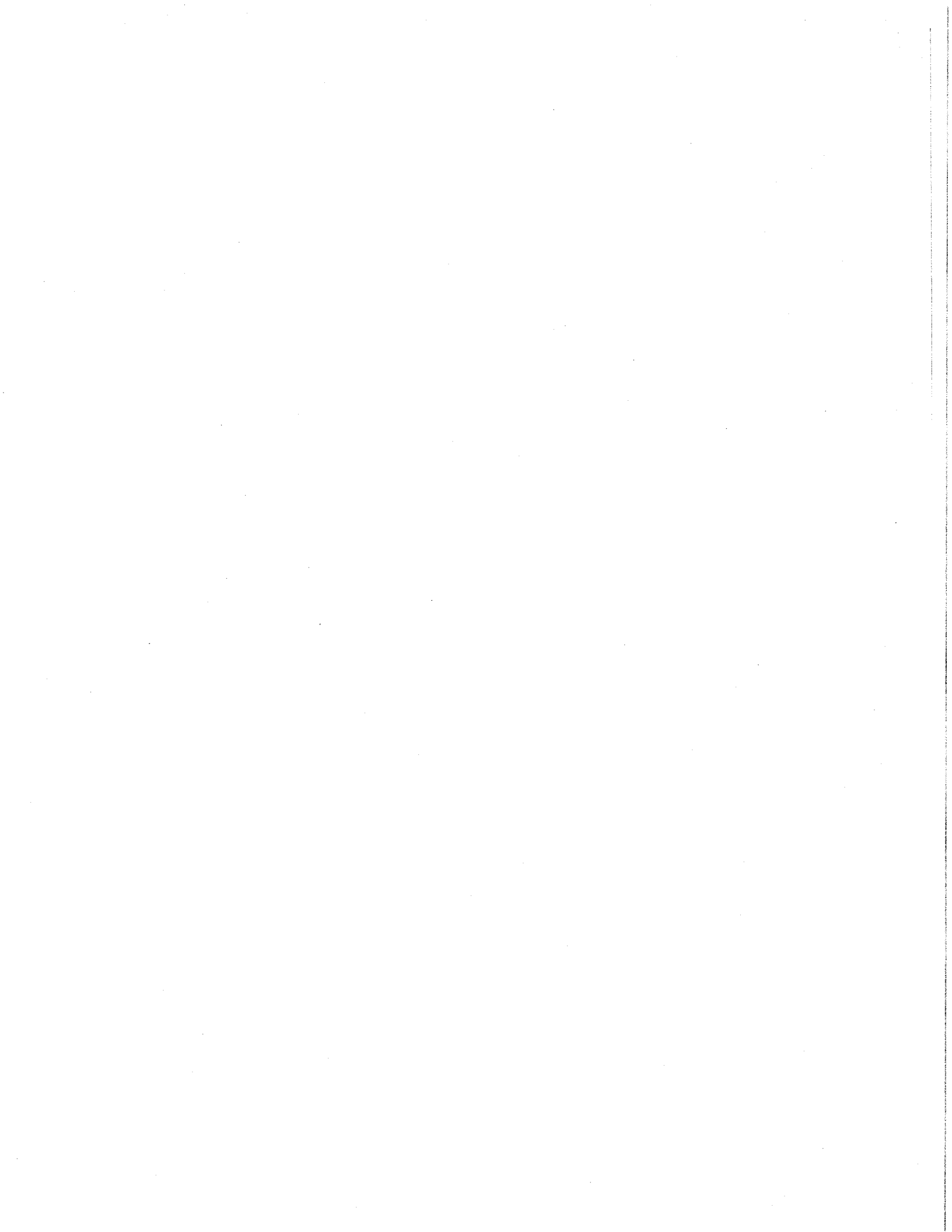
Attached please find comments on the Proposed Amendments to 25 Pa Code Chapter 102 (Erosion and Sediment Control and Stormwater Management) submitted on behalf of Waste Management of Pennsylvania, Inc.

At her request, I am also transmitting a copy of this email and the attachment to Margaret O. Murphy, Assistant Counsel, Bureau of Regulatory Counsel, Pennsylvania Department of Environmental Protection.

Jonathan

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Chambers, Laura M.

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From: Larry Martick [lmartick@adamscounty.us]
Sent: Monday, November 30, 2009 3:33 PM
To: EP, RegComments
Subject: FW:

DEC 7 REC'D

INDEPENDENT REGULATORY
REVIEW COMMISSION



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703.pdf (888 KB...

Attached are the Adams County Conservation District's Comments on the Proposed Chapter 102 Regulations. We appreciate the opportunity to provide our written comments and concerns.

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-----Original Message-----

From: administrator@adamscounty.us [mailto:administrator@adamscounty.us]

Sent: Monday, November 30, 2009 3:37 PM
To: Larry Martick
Subject:

KM-4050
