

Bartramian Audubon Society
P.O. Box 315
Slippery Rock, PA 16057

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DEC - 7 REC'D

REGULATORY
COMMISSION

November 30, 2009

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105
regcomments@state.pa.us

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

The Bartramian Audubon Society and its 400 members strongly support a mandatory stream buffers program, not a voluntary one. We also feel that the DEP should not eliminate technical review of stormwater plans. Without review by the state and without opportunities for public comment, stormwater management will get worse, not better.

We applaud DEP for requiring forested buffers on EV streams, but we need to 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. Many municipalities in Pennsylvania already require at least 100 foot buffers, demonstrating that environmental improvements can be achieved without economic burdens.

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, like the new "permit-by-rule" (PBR) program, puts rivers and streams at risk, is poor policy, and violates core requirements of the Clean Water Act. Of particular concern is the fact that the PBR would apply in High Quality and Impaired watersheds. These watersheds require special protections to ensure that water quality is protected and maintained. Those special protections cannot be ensured through an expedited permit review process.

Please make minimum 100 foot forested stream buffers a mandatory requirement on all streams in Pennsylvania.

Respectfully,

Kathie Goodblood
President, Bartramian Audubon Society

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Chambers, Laura M.

From: Kathie Goodblood [larkwren@hughes.net]
Sent: Monday, November 30, 2009 8:56 AM
To: EP, RegComments
Cc: amisak@cleanwater.org
Subject: 25 PA. CODE CH. 102

INDEPENDENT REGULATORY
REVIEW COMMISSION

Please find attached letter.
Thank you

Kathie Goodblood
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