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GREATER PHILADELPHIA CHAMBER OF COMMERCE Get involved, Get results...

200 South Broad Street, Suite 700, Philadelphia, PA 19102-3896 P 215-545-1234 f 215-790-3600 w greaterphilachamber.com

DEC - 7 RECD

November 25, 2009

INDEPENDENT REGULATORY REVIEW COMMISSION

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,

Ove Mahon

Joseph W. Mahoney, Jr. 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

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## Chambers, Laura M.

## INDEPENDENT REGULATORY REVIEW COMMISSION

DEC 7, REC'D

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From: Pam McCormick [pmccormick@greaterphilachamber.com]

Sent: Wednesday, November 25, 2009 10:24 AM

To: EP, RegComments; Hanger, John; mwhite@pasen.gov; musto@pasenate.com

Cc: Joe Mahoney

Subject: Proposed 25 PA Code Chapter 102 Rulemaking - Comments

On behalf of the Greater Philadelphia Chamber of Commerce, I am forwarding the attached comments on the Proposed 25 PA Code Chapter 102 Rulemaking. Thank you for your review and consideration.

Pamela Sarne McCormick Greater Philadelphia Chamber of Commerce 200 S. Broad Street, Suite 700 Philadelphia, PA 19102 215-790-3612 office 215-790-3788 fax pmccormick@greaterphilachamber.com