

Chambers, Laura M.

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From: James R. Coslo [jrcoslo@co.centre.pa.us]

Sent: Wednesday, November 25, 2009 12:32 PM

To: EP, RegComments

Cc: Robert E. Sweitzer

Subject: 25 PA. CODE CH. 102, Erosion and Sediment Control and Stormwater Management

INDEPENDENT REGULATORY
REVIEW COMMISSION

I would like to offer the following comments on the Environmental Quality Boards proposal to amend 25 PA. Code Chapter 102, on behalf of the Centre County Conservation District:

1. We support the increase in permit fees, 102.6(b)(2) to help offset the cost of administering the program(s)
2. We have a concern about the enforcement of the many requirements associated with the Riparian Forest Buffers, 102.14. It is not clear in the regulations which agency(ies) will enforce these requirements. It appears that it will be a significant financial and manpower burden on the responsible agency.
3. We object to the removal of "county conservation districts" from 102.4(b)(4)(6)(v), relating to approval of alternative BMP's.

Thank you for the opportunity to comment on these proposed amendments.

Jim Coslo
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