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INDEPENDENT REGULATORY
REVIEW COMMISSION**Chambers, Laura M.**

From: Donald P. Oaks [dpofc@comcast.net]
Sent: Monday, November 30, 2009 5:10 PM
To: fforaday@aol.com; EP, RegComments; obarto@comcast.net; ed.eskinc@verizon.net; jghforester@comcast.net; ansaf@verizon.net; destro4@verizon.net; steiner@psu.edu; lcasey@comcast.net; mrkrwebb@earthlink.net; normlacasse@verizon.net; Piper@co.cambria.pa.us
Cc: kbenning@pahousegop.com
Subject: RE: Proposed Rulemaking; EQB [25 PA. CODE Chapter 102] Erosion and Sediment Control and Stormwater Management

Alex:

Excellent response!

Don

From: fforaday@aol.com [mailto:fforaday@aol.com]
Sent: Sunday, November 29, 2009 4:33 PM
To: RegComments@state.pa.us; obarto@comcast.net; dpofc@comcast.net; ed.eskinc@verizon.net; jghforester@comcast.net; ansaf@verizon.net; destro4@verizon.net; steiner@psu.edu; lcasey@comcast.net; mrkrwebb@earthlink.net; normlacasse@verizon.net; Piper@co.cambria.pa.us
Cc: kbenning@pahousegop.com
Subject: Proposed Rulemaking; EQB [25 PA. CODE Chapter 102] Erosion and Sediment Control and Stormwater Management

As President of the Pennsylvania Council of Professional Foresters, and in regard to the above-referenced proposed rule-making, I submit the following comments.

With all the language in the proposed changes regarding streams, waters, ponds, etc., and forests associated with these waters, I find that forestry professionals are not mentioned in these rule changes. This is an oversight, possibly deliberate, and one that should be corrected before these changes become law. If the intent of these changes is to protect the waters of the Commonwealth from excessive erosion and sedimentation and to control storm water, then professional foresters, as the natural resource managers, should be included in the current legislation..(Frankly, I fail to understand why we were not included in the current legislation at the beginning!)

From the beginning of DEP, and before that--DER, and before that--Department of Forests and Waters, Pennsylvania government's regulatory professionals and natural resource managers rarely worked in unison. The natural resource managers and the regulators had separate offices and separate deputates. Why?...Did the natural resources of Pennsylvania benefit from these "separate but equal" times? (I'll let your own knowledge of and sense of history answer that one.)Now we are at a crucial time in our history of the management of the Commonwealth's natural resources--the improvement of our waters, and ultimately, the clean-up of that bigger downstream freshwater estuary--the Chesapeake Bay...What better way to demonstrate our good efforts and intentions in this clean-water initiative than by recognizing foresters as fellow professionals -- both the public (DCNR & DEP) and private (ACF, as well as private forest consultants) sectors in this proposed legislation!

12/4/2009

In my 38+ years professional career with DCNR/Bureau of Forestry, I repeatedly found that teams consisting of practitioners and regulators/researchers always got to the heart of a problem; found a workable solution, and got the job done faster than any other combination of problem solvers. I believe this same strategy will work again as we tackle the cleanup of our waters in Pennsylvania and assist with those of our downstream neighbors...Simply recognizing foresters as fellow professionals and as part of the natural resource management team will go a long way toward accomplishing the goal of cleaner water for all of us.

In my last 18 years with DCNR-Bureau of Forestry, I was intimately involved with forest, shrub and grass regeneration strategies and with plans for these on both public and private lands in Pennsylvania. As a result of this experience, I learned quite a lot about techniques that worked, as well as those which did not. As a manager, I shared this information, gained through on-the-job training and through professional courses ,with co-workers, private landowners and fellow professionals. This interchange of ideas and continuing professional training resulted in many successful tree/plant regeneration efforts of forests, open areas, strip mines and wetlands. This same training and the resultant on-the-ground expertise is currently being put to use by DCNR (private land) Service Foresters as well as many professional foresters in the private sector. The credentials all these professionals now possess qualify them to prepare, oversee, and certify completion of stewardship plans for public and private land. They only lack official professional recognition, through licensing, in order to make them part of a team which is amply qualified to manage the forests, uplands and riparian areas of the Commonwealth. By recognizing all DCNR/DEP foresters as well as qualified foresters in the private sector, our lands and waters will receive increased care and oversight without any costs to either DEP or DCNR.

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