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To: EP, RegComments

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

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12/7/2009

The Pennsylvania Society of Land Surveyors respectfully submits the following comment on the proposed change in **25 PA. CODE CH. 102.**

The regulations add the definition ***Licensed professional--Professional engineers, landscape architects, geologists and land surveyors licensed to practice in this Commonwealth.*** We believe that Professional Land Surveyors are an appropriate professional to seal E&S plans as the Professional Engineer, Land Surveyor and Geologist Registration law specifically grants engineers and land surveyors the authority to prepare E&S surveys through the definition of Engineering Land Survey.

- (j) **"Engineering Land Surveys"** means surveys for:...
- (iv) ***storm water management surveys and sedimentation and erosion control surveys;***
- (v) the determination of the quantities of materials; (vi) tests for water percolation in soils; and (vii) **the preparation of plans and specifications and estimates of proposed work and attendant costs as described in this subsection. *(Emphasis added)***

§ 102.15. Permit-by-rule for low impact projects with riparian forest buffers does not use the defined term Licensed Professional but rather states that these plans must be prepared by professional engineers, geologists and landscape architects, excluding the professional land surveyor. We believe that the land surveyor has been excluded inadvertently or inappropriately and request that all licensed professionals be permitted to seal these plans in accordance with the appropriate licensing act.

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