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Chambers, Laura M.

**From:** Tim Schumann [tschumann@verizon.net]**Sent:** Monday, November 30, 2009 5:04 PM**To:** EP, RegComments**Subject:** PROPOSED RULEMAKING on 25 PA CODE CH. 102: Erosion and Sediment Control and Stormwater ManagementINDEPENDENT REGULATORY  
REVIEW COMMISSION**RE: PROPOSED RULEMAKING on 25 PA CODE CH. 102: Erosion and Sediment Control and Stormwater Management**

Maintaining the health of Pennsylvania's streams and water resources is imperative if we are to maintain healthy Pennsylvanians. We depend on these water resources for so many things from our drinking water to our recreation. Protecting these resources from degradation through adequate regulations and effective and consistent enforcement of those regulations is essential.

Mandatory forested riparian buffers along all of Pennsylvania's streams are a necessary component of protecting these streams from degradation. These buffers reduce pollution, limit erosion and sedimentation, improve habitat for fish and keep our streams cooler; essential if we are to maintain our suburban streams as Trout Stocked Fisheries. A minimum forested buffer of 100 ft along all Pennsylvania streams should be mandatory with wider buffers required for headwater streams and High Quality and Exceptional Value streams. Mandatory buffers are a win-win for the environment and the economy. They will reduce damage from flooding, decrease drinking water treatment costs, increase local property values and cut stormwater management costs.

All uncontrolled stormwater has the potential to degrade water quality in our streams. Therefore, all earth disturbance activities, including oil and gas development, should be required to obtain NPDES permits for stormwater discharges associated with their construction activities. Consistent enforcement is essential. It is also important that the requirement for obtaining an E&S permit for timber harvesting and road maintenance be reduced to 5 acres.

The newly proposed expedited permit review process, "permit by rule" (PBR) is an ill-conceived idea that appears to violate important requirements of the Clean Water Act. It will not provide adequate analysis of new discharges into our local impaired streams. It is imperative that the DEP continues to review stormwater plans for new discharges to ensure that water quality in these impaired streams is not further degraded and standards of the Clean Water Act are met.

Thank you for providing me with the opportunity to express my views on this important subject.

Sincerely,

Tim Schumann

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12/4/2009