



# Pennsylvania Federation of Sportsmen's Clubs

2426 North Second St. • Harrisburg, PA 17110

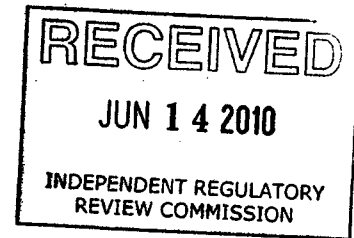
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Providing leadership and advocacy for the enhancement of our fish and wildlife resources for the benefit of all hunters, anglers and conservationists. Protecting our 2<sup>nd</sup> Amendment Rights.

Independent Regulatory Review Commission  
333 Market Street  
14th Floor  
Harrisburg, PA 17101  
RE: Comments on EQB Regulation 7-446 (IRRC 2806)



Dear Commissioner's of the IRRC,

I am writing you this letter today on behalf of the Pennsylvania Federation of Sportsmen's Club (PFSC) regarding the proposed revisions to 25 PA Code, Chapter 95 for control of Total Dissolved Solids (TDS). The PFSC, an organization founded in 1932 to fight for clean water, currently represents over 90,000 sportsmen and women in the Commonwealth. At our last Board of Director's meeting our leadership expressed extreme concern for the health and future of our waters throughout Penn's Woods and reviewed the final-form version of the proposed regulatory changes to Chapter 95.

After reviewing the final form version, our leadership unanimously supported the regulatory changes and encourages the IRRC to approve these modifications that would increase protection to our precious waters of the Commonwealth. To this end, we respectfully offer bullet points of our commentary for your consideration.

- In the last 18 months, many of our members throughout the state have personally experienced water quality advisories on waters in their region due to high total dissolved solid levels. These levels exceeded safe drinking water levels and safe levels for freshwater biota.
- High levels of TDS allow for non-native toxic algal blooms such as the golden algae. Our members experienced the degradation of a unique warm water fishery and witnessed a total kill of aquatic life in over 30 miles of Dunkard Creek in Greene and Fayette Counties in Southwestern Pennsylvania last year. The TDS levels were documented as 50,000 mg/L; the EPA considers 1,000 mg/L unfit for human consumption.
- High TDS levels can also indicate the presence of toxic materials including, but not limited to, cadmium, lead, and arsenic.
- Throughout our state the exploration and extraction of natural gas from the Marcellus Shale formation is exponentially increasing. It is imperative that the state protect the waters of the Commonwealth from the potential contamination caused by millions of gallons of highly concentrated hydraulic fracturing fluid.
- We are blessed in Pennsylvania to amass over 83,000 miles of flowing water. The activities and recreation associated with the quality of our streams generate billions of dollars in revenue annually, with almost \$5 billion contributed to fishing alone.

- While the PFSC encourages economic growth, we strongly feel that sacrificing clean water is never an option and all regulations should be composed in such a way to protect our land and waters, which are held in trust for all citizens of the Commonwealth.

In closing, we would like to share a quote from Judge Grover C. Ladner, the first President of the PFSC written in 1932 during the peak of the coal extraction era to each gubernatorial candidate, "*Stream Pollution has reached a point where it threatens to destroy not only many industries which must have pure water for their processes, but endangers the comfort, health, and very lives of the people.*". It was in 1937 that the Pennsylvania Clean Streams Act was passed to help protect our waters from further degradation.

It is the hope of the PFSC that the Commissioner's keep in mind not only the present health of our waters, but the maintenance of the health of our waters for generations to come for all citizens of the Commonwealth.

We thank you for your consideration of this important issue and respectfully ask that you support the proposed revisions to 25 PA Code, Chapter 95 and continue to place Pennsylvania among the leaders of clean water regulations in the nation.

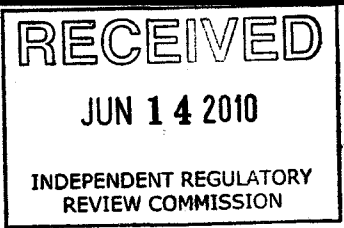
Yours in Conservation,

Devin DeMario  
Conservation Committee Chair  
The Pennsylvania Federation of Sportsmen's Clubs

CC: EQB

#2806

**From:** Devin DeMario [devindemario@yahoo.com]  
**Sent:** Monday, June 14, 2010 8:55 AM  
**To:** IRRC  
**Subject:** #7-446 (#2806)  
**Attachments:** IRRC PFSC 7446\_2086.doc



Please see attached document provided by the Pennsylvania Federation of Sportsmen's Club in support of proposed regulatory changes to Chapter 95.

We thank you in advance for your consideration of this important water quality issue in the Commonwealth.

Warm Regards,  
Devin DeMario  
Conservation Chair  
Pennsylvania Federation of Sportsmen's Club