

# **Comments of the Independent Regulatory Review Commission**



## **Department of Conservation and Natural Resources Regulation #7B-7 (IRRC #3072)**

### **State Forest Picnic Areas**

**November 5, 2014**

We submit for your consideration the following comments on the proposed rulemaking published in the September 6, 2014 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a)) directs the Department of Conservation and Natural Resources to respond to all comments received from us or any other source.

#### **Section 21.120. Ground blinds and tree stands. – Clarity; Need.**

Subsection (c) contains the following sentence “Violation of this section is prohibited.” We question the need for this language given that prohibited activity is addressed in Section 21.123 (Violation of rules regarding conduct in State forests). We recommend that subsection (c) be deleted. The same concern applies to Section 21.121 (c).