

3184



Shaver's Creek

ENVIRONMENTAL CENTER



PennState

3400 Discovery Road
Petersburg, PA 16669-2114

Phone: 814-863-2000
Fax: 814-865-2706

Web: ShaversCreek.org
Email: ShaversCreek@psu.edu

December 22, 2017

To Whom It May Concern,

I am writing to support proposed regulatory updates contained within 17 PA. CODE CH. 45 Conservation of Pennsylvania Native Wild Plants 47 Pa.B. 7210. As a professional botanist, I am concerned about plant protection and applaud the Pennsylvania Department of Conservation and Natural Resources (DCNR) for targeting its protection list to plants most in need. With these updates, DCNR is bringing the best available science to update the Pennsylvania plant protection list. This list is generated and updated from scientific data, extensive discussion and classification recommendations that DCNR receives from the Pennsylvania Biological Survey's (PABS) Vascular Plant Technical Committee (VPTC)—which is comprised of professional botanists. DCNR also receives input from a public forum of the VPTC—the Rare Plant Forum. As a member of the VPTC, and a regular attendee of the RPF, I am especially aware that the proposed status changes are supported by scientific documentation using nationally recognized standards and methodology to assess plant conservation needs.

Importantly, these proposed changes represent neither an increase or decrease in regulations; rather, they fine-tune existing regulations to increase efficiency and effectiveness. The proposed regulations will not pose any additional permit review burden because there is no net increase in the number of species protected: nine are proposed to be added while thirty-one are proposed to be removed. Specifically, these proposed updates (1) fix problems with the out-of-date list that are harmful to both conservation and permitting because the old list includes species that don't need protection and leaves out species that do need conservation assistance; (2) will make permit review more efficient by eliminating unnecessary reviews for species no longer deemed in need of conservation help; and (3) will allow the DCNR to come into compliance with a legal requirement to update such lists on a regular basis.

In closing, the DCNR is acting on its responsibility to classify wild plants as set forth in the Wild Resource Conservation Act and is acting to follow the directive of the Pennsylvania Constitution's Article 1, section 27: "the Commonwealth shall conserve and maintain them [public natural resources] for the benefit of all the people." I strongly urge that these much-needed regulatory updates be accepted and adopted by the state of Pennsylvania.

Respectfully,

Eric P. Burkhardt, PhD

Program Director, Plant Science, Shaver's Creek Environmental Center
Faculty Member, Ecosystem Science and Management Department
The Pennsylvania State University

2018 JAN 10 P 12: 02

RECEIVED
IRRC