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**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Monday, May 13, 2019 9:41 AM  
**To:** Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: WQM and NPDES Permit Application Fees and Annual Fees (#7-533)(correction to Table in § 91.22(a) published April 6, 2019; 49 Pa.B. 1665)



**Re: eComment System**

**The Department of Environmental Protection has received the following comments on Proposed Rulemaking: WQM and NPDES Permit Application Fees and Annual Fees (#7-533)(correction to Table in § 91.22(a) published April 6, 2019; 49 Pa.B. 1665).**

Commenter Information:

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Comments entered:

I am writing in extreme opposition to any increase in fees. If you're reasoning for raising fees is to cover your costs of reviewing it then stop asking for useless paperwork in the first place. If the state is going to require paperwork then it should be responsible for dealing with it. What you are asking for is me to spend tens of thousands of dollars a year to pay someone to do the paperwork and then than pay you to review it! What is the incentive to reduce paperwork? It's not, it's only an incentive for both sides to increase paperwork! Plus the fact that we are not able to pass these costs on to anyone else. A majority of this paperwork does nothing to prevent accidents or issues on the farm. The money can be better spent on improvements that may be needed. A well written BMP is much more effective in management for daily operation. Farmers are not out to rape the land for money, including CAFOs or the land would already be gone or they would be out of business. Most CAFOs are family owned and it is the only way to afford to have multiple family members involved in the business. It is also the only way to utilize some technologies that are good for the environment. Possible nutrient runoff from farms is much less hazardous than the bacteria, trash and chemicals washed into the storm drains of cities. Not to mention the millions of tons of salts deliberately used on the roads in PA every year that directly go into the waterways. Stop making AG the leader in water problems when it has improved dramatically over the years and continues to do so every year with new techniques and technologies.

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