

From: ecomment@pa.gov
Sent: Wednesday, May 15, 2019 4:27 PM
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:

Environmental quality board

The purpose of this email is to submit comments to DEP proposed change to NPDES/WQM permit fees.

The proposed fee increases for NPDES and water quality part two permits have so many reasons why they should not be considered. The bureaucracy created to regulate farmers that have made a conscious decision to invest into a business model that can be successful for their families future, has landed them in the expensive, burdensome, micromanaged side of double standards (a different set of environmental regulations for different size farms)created to discourage consolidation in the dairy industry.

DEP has discovered how expensive the program has become and wants to pass the cost onto farmers that are already burdened with the high cost associated with the cumbersome time-consuming process. The solution to a unaffordable process should be to reevaluate ,simplify ,and live within your means ,we do not need a handcrafted Rolls-Royce model.

Some would say that farms just have to consider it a cost of doing business but that cost is a huge financial burden to the ag community,In many many cases is being paid for with borrowed money and equity out of their farm.

The drafters of these proposed fees have not read or got the memo from Governor Wolf or

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secretary Reading asking what can we do to help the dairy industry in Pennsylvania.

Many within DEP ,along with all Pa in the balance partners have recognized the importance of building bridges and working together to achieve water quality goals. These proposed fees will burn a lot of bridges and in the long run be very costly to water restoration efforts , you must remember that farmers host on farm meetings, on farm training sessions, attend DEP advisory boards,Nutrient management advisory boards, sit on conservation district boards, ag WIP meetings, PA in the balance, and many many others. These are meetings that farmers are normally a minority of ,which are not being paid to be in attendance. Ask yourself who truly has the most commitment.

DEP is at stake of losing these critical partners. I personally have always considered DEP to be a partner because we share the same goals (clean water). Clearly we cannot share the goals of these proposed fee increases.

Annual CAFO inspections are only required to be performed once in a five-year permit cycle , where is the justification for the absurd cost of \$9000 in a five-year permit cycle. If we allowed 10 hours for a inspection and 20 hours for a permit review, this is the estimated cost.\$ 9000 divided by 30 hours is 300 dollars a hour. Absurd We all know the lack of personnel and political will at DEP to enforce laws that have been on the books for over 40 years are the real problem with meeting WIP goals , asking the permitted sector of ag to pay for these discriminating absurd costs of \$9000 per cycle is only going to have adverse effect on meeting watershed goals.

There needs to be an honest discussion as to how to move forward with regulating agriculture without increasing the double standards that already exist.

Additionally the authorization to automatically index fees every two years is also very problematic from the ag perspective and very much opposed.

James Harbach

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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