

PA Campaign for Clean Water * ALLARM * Alliance for a Sustainable Future * Ambler Environmental Advisory Council * American Rivers* Aquashicola Pohopoco Watershed Conservancy * Black Hole Creek Watershed Association * Blacklegs Creek Watershed Assn. * Blue Mountain Preservation * Brandywine Conservancy * Brodhead Watershed Association * Bucks County Chapter, Trout Unlimited * Buffalo Creek Watershed Alliance * Carroll Citizens for Sustainable Growth * Center for the Celebration of Creation * Center for Healthy Environments and Communities * Chesapeake Bay Foundation * Chestnut Ridge Chapter, Trout Unlimited * Clean Water Action * Clean Water Fund * Clearwater Conservancy * Coalition for Responsible Growth & Resource Conservation * Conodoguinet Creek Watershed Assn. * Cooks Creek Watershed Association * Cumberland Valley Trout Unlimited * Delaware Nature Society * Delaware River Greenway Partnership * Delaware Riverkeeper Network * Ecological Associates * Ecology Mission Group, Central Baptist Church * Elk Creeks Watershed Association * Friends of the Little Aughwick Creek * Friends of Poquessing Watershed * GreenTreks Network * Green Valley Coalition * Green Valleys Association * Heritage Conservancy * Juniata Valley Audubon Society * League of Women Voters of Pennsylvania * Lehigh Valley Audubon Society * Little Juniata River Association * Little Lehigh Watershed Coalition * Little Mahoning Creek Watershed Association * Loyalhanna Watershed Association * Loyalsock Creek Watershed Association * Middletown Township Land Conservancy * Montgomery County Land Trust * Muncy Creek Watershed Association * North Coventry Township Board of Supervisors * Peach Bottom Concerned Citizens Group * Penn Future * Pennsylvania Association of Floodplain Managers * Pennsylvania Council of Churches * Pennsylvania Environmental Defense Foundation * Pennsylvania Forest Coalition * Pennsylvania Trout Unlimited * Penns Valley Conservation Association * Pine Creek Valley Watershed Association * Radnor Racquet Club * Responsible Drilling Alliance * Save Our Allegheny Ridges * Sierra Club, Allegheny Group * Sierra Club, Kittatinny Group * Sierra Club, Moshannon Group * Sierra Club, Otzinachson Group * Sierra Club, Pennsylvania Chapter * Sierra Club, Southeastern Penna. Group * South Branch Tunkhannock Creek Watershed Coalition * Three Rivers Waterkeeper * Tinicum Township Board of Supervisors * Upper Providence for Open Space * Valley Forge Chapter, Trout Unlimited * White Clay Wild & Scenic Program * Wissahickon Valley Watershed Association * York Conservation Alliance

June 9, 2010

Independent Regulatory Review Commission
333 Market Street
Harrisburg PA 17120

RE: Docket Number #2783

The undersigned organizations strongly urge you to approve the Environmental Quality Board's proposed revisions to the Chapter 102 regulations, including the section that would mandate 150 foot buffers for new development along Exceptional Value (EV) and High Quality (HQ) streams.

Requiring developers to maintain a buffer of trees and plants alongside our state's best streams is a smart, low-cost solution to protect these important natural resources and the communities and businesses that depend on them. Because buffers take advantage of Pennsylvania's existing natural resources, they deliver big benefits at little or no cost to taxpayers and businesses.

Buffers benefit our state by:

- **Keeping drinking water safe:** By filtering pollutants out of runoff before it reaches our rivers and streams, buffers help reduce the cost of treating our drinking water. According to the EPA, every dollar invested in protecting the sources of our drinking water saves \$27 in drinking water treatment costs.
- **Reducing the risk of flood damage:** Buffers keep new development away from the stream's edge, reducing damage when flooding happens. In addition, with fewer structures near the water's edge, runoff can be reduced and the volume of flood waters minimized.
- **Increasing property values:** Studies have shown that stream buffers increase property values and the prices that buyers are willing to pay for properties. This in turn increases the local tax base and tax revenues for Pennsylvania's municipalities.
- **Protecting our streams:** Buffers help filter nutrients out of runoff, protecting our streams from excess nitrogen and phosphorus. They shade streams, helping cool them, and provide food for fish and other aquatic organisms. They reduce erosion and scouring, helping preserve stream banks and stream bottoms from damage.
- **Saving Pennsylvania money:** Buffers can help reduce the cost for municipalities of stormwater management by using existing natural resources more effectively. This helps save tax dollars.

With tourism and recreation serving as major drivers of Pennsylvania's economy, and EV and HQ streams among the top destinations for anglers and eco-tourists, it is critical that we protect the resources these industries depend on. In 2008, Pennsylvania's tourism industry provided \$18 billion in wages to more than 600,000 residents. Fishing activities alone generate \$4.7 billion per year in revenue for the state—supplying 43,000 jobs.

Requiring buffers on streams is not a new concept. **Over 192 municipalities in a dozen counties in Pennsylvania already have ordinances in place that require buffers on their streams and rivers.** One third of these communities already require buffers of at least 100 feet for new developments, and some require as much as 300 foot buffers for EV and HQ streams.

However, to be truly effective, buffers must be required on the full length of a stream. Just one municipality in the middle of a watershed without a buffer rule can undermine the protection afforded to that township and its downstream neighbors from pollution and flood damage. The best way to protect our most sensitive streams is with a statewide requirement.

Several of our neighboring states also require buffers on their streams. New Jersey requires 300 foot buffers on its C-1 streams (the equivalent of our EV streams). The state of Maryland requires 200 foot buffers on the Chesapeake Bay and tidal reaches of the streams that drain into it.

Experience in Pennsylvania municipalities with existing buffer ordinances indicates that they have no negative effect on development activity in those communities. A survey of seven municipalities in Chester, Monroe and Northampton counties found that enactment of 100 foot buffer ordinances did not slow development in these municipalities. 77 NPDES stormwater construction permits were granted in these municipalities in the year after adoption of their buffer ordinance while only 63 were issued in the year before adoption of the ordinances.

Protecting the clean streams that fuel our economy and safeguard our health is a wise investment in the future of our commonwealth. We strongly urge you to help ensure our

streams and the communities they support are protected by approving the changes DEP has proposed to Chapter 102.

Sincerely,

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