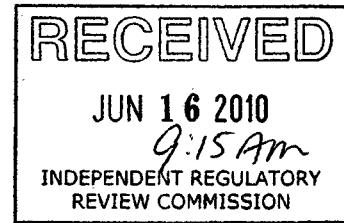


Lebanon County Planning Department

EMBARGOED MATERIAL

June 11, 2010



IRRC

2783
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: FINAL RULEMAKING EROSION & SEDIMENT CONTROL AND
STORMWATER MANAGEMENT (25 Pa Code Chapter 102)

To Whom It May Concern,

Please be advised that the Lebanon County Planning Department has reviewed the proposed Title 25, Chapter 102 regulations. We are pleased to given the opportunity to offer comments on the proposed regulations.

It appears that the proposed regulations have been hastily created and, quite frankly, are unnecessary. The existing regulations, combined with the Federal Stormwater Regulations, The Clean Water Act, and Chapter 93 are more than adequate for the regulation of post-construction stormwater management. Additional regulations add more confusion to a program that is in desperate need of simplification.

Other, more specific, comments are as follows:

- If the regulations must be changed, is it wise to combine post-construction regulations into the Chapter 102 Erosion and Sediment Control requirements?
- The modified fee schedule remains excessive, but is more palatable than the fee schedule originally proposed.
- As IRRC suggested in their initial comments, published in the *Pennsylvania Bulletin*, a public comment period should be required for the proposed regulations.

We appreciate the opportunity to provide input on the proposed regulations. Please feel free to contact me with any questions.

Sincerely,

Kristopher Troup
Executive Director