

2783

# EMBARGOED MATERIAL

**From:** Steven Cupps [SteveC@Realen.com]  
**Sent:** Thursday, June 17, 2010 8:40 AM  
**To:** IRRC  
**Subject:** Disapprove final Chapter 102 Regulations - rulemaking

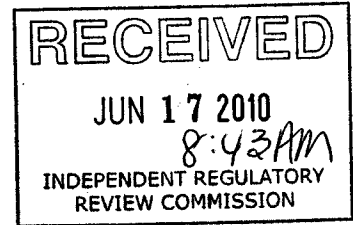
I thank you for the opportunity to offer comments on the final 25 Pa. Code Chapter 102 rulemaking, regulation #2783. We have a number of concerns with respect to the proposed rulemaking and urge you to **disapprove** the final rulemaking. The mandatory 150-foot buffer on both sides of all HQ/EV streams and the ultra-conservative storm water infiltration requirements will be extremely detrimental to the commercial, retail, and residential industries as a whole and our business individually.

Assuming the Commonwealth will ultimately adopt some form of riparian buffers, we recommend and request that the requirements include the ability to create flexible designs by using other best management practices in conjunction with reduced buffer widths to achieve the results sought by the use of buffers alone. We would also like to see infiltration standards that more closely mimic existing conditions instead of an artificial standard.

We are in desperate economic times. Adopting the regulations as is, without taking advantage of our country's broad engineering knowledge base, will likely be the death knell to many existing and proposed projects. Please disapprove these regulations and push for the implementation of guidelines that both protect the environment and allow vitally needed growth.

Thank you.  
SjC

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