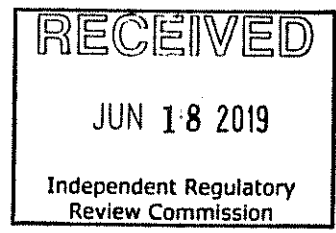


# 3231



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

Mr. Patrick McDonnell, Secretary  
Pennsylvania Department of Environmental Protection  
Rachel Carson State Office Building  
PO Box 2963  
Harrisburg, PA 17105



Re: IRRC #3231 Air Quality Fee Schedule Amendments

Dear Mr. McDonnell:

We write to share our comments regarding the department's proposed rulemaking on amendments to the state's air quality fee schedule which was published in the Pennsylvania Bulletin on April 13, 2019. The Association is a non-partisan, non-profit member service organization. Member townships represents 5.6 million Pennsylvanians — more residents than any other type of Pennsylvania municipal government and cover 95 percent of the commonwealth's land mass.

It is with considerable concern that our members continue to watch the department turn to the regulated community to generate funds needed for state environmental programs, in this case, the state's air quality program. The new and revised fees included in this proposed rulemaking will provide approximately 65% of the air quality program budget, with the state's General Fund and federal grants making up the remainder.

We understand the department's reluctance to anticipate any increase in receipt of federal grants directed toward the state's air quality program. However, we believe that the General Assembly should be increasing the allocation of state funds to adequately support the Commonwealth's air quality program rather than the department turning to the regulated community for more and more funds.

At the PSATS 2019 Annual Conference this past April, our members passed a resolution stating that municipalities should not be paying ever-increasing permit application fees for their stormwater permits. That sentiment should be carried over to those municipalities that must obtain air quality permits.

In recent years, the department's air quality program has experienced shortfalls in fee revenue due to emissions reductions at major facilities, a situation that should be celebrated as an indication of the benefits of the massive investment that the regulated community has spent on reducing emissions. Emissions are also down due to the conversion at many major facilities to burning natural gas.

Thank you for the opportunity to share our concerns. Should you have any questions on these matters, please contact us.

Sincerely,

David M. Sanko  
Executive Director