



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, January 28, 2021 11:22 AM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; lversen, Sarah A.
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Dam Safety and Waterway Management (#7-556)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Dam Safety and Waterway Management (#7-556).

Commenter Information:

Diane Selvaggio
 (dianeselvaggio@hotmail.com)
 5096 Hardt Rd
 Gibsonsia, PA 15044 US

Comments entered:

Dear Environmental Quality Board,

Perhaps because Pennsylvania typically has ample rainfall, we have historically been a little too blasé about the enormous inherent value of water resources. We have a shameful history of mismanaging, if not absolutely squandering, these resources. Consequently, we need to develop a comprehensive, smart strategy for approaching our water - and everything from ephemeral streams and wetlands to rivers and lakes that function as the natural infrastructure underpinning our water riches. I refer the EQB to the good ol' water cycle. Turns out the darn thing works - and works very effectively to our societal advantage.

Consequently, the EQB should fully consider its vital mission to public health and the environment before finalizing its proposed revisions to Chapter 105, governing dams, water obstructions, and encroachments into aquatic resources.

One of the huge gaps in effective water management is reliance upon dollar metrics - without assigning valid dollar values to natural infrastructure, to what is now legally-inflicted private property damage, to the economic advantages of flood prevention, etc.

Under this cloud, the Board unfairly consulted with industry groups early in the revision process, without giving public interest groups this same early access or notification regulatory revision was occurring - as should be their right. So now, the Board should give comments from environmental and public interests groups significant consideration. These comments should become an opportunity for further dialogue and contribution.

Additionally, the Board has an obligation to revise the permitting process so it no longer lopsidedly advantages industry. The Board should be revising these regulations to protect all of our natural water infrastructure and make it harder for industry to negatively impact it. Making it easier for industry to get permits or evade the permitting process altogether by expanding the number of activities eligible for a waiver out of the permitting process is a total travesty. Many Pennsylvania waterbodies are extremely important and threatened, and there should be NO waivers granted for activities in these waterbodies, no matter how small the stream size. The Board should reduce, should NOT expand, the number of waivers granted, and should NEVER allow any waivers for activities impacting EV, HQ, Class A, wild trout, or already impaired streams.

The Board should reconsider its proposal to require a company seeking a permit for an industry activity that crosses multiple counties (e.g. pipeline) to submit only one application. This change appears to be rather underhanded because it eliminates working with each county the activity impacts. Making it harder for counties and residents to learn about proposed industrial activities that could well affect their waters clearly reduces citizens' rights to participate, having their voices become part of the process, is simply wrong.

Thank you for your consideration.

Sincerely,

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov