



Now is the time to develop stronger regulations to protect our water, land and people against the worsening floods in our future. The Pennsylvania Department of Environmental Protection (PADEP) and the Environmental Quality Board (EQB) should adopt strict rules that will protect land and water areas that can mitigate flooding. Residential and commercial development cannot occur safely without adequate accommodation for greater water runoff in the future.

Previous revisions of Chapter 105, in 1991, aimed to 'ensure more adequate protection of wetlands' and simplify permitting. Unfortunately, life threatening floods and contamination of drinking water continue. It is clear that the PADEP has engaged many stakeholders in the revision of regulations.

The text we can read does not provide detail about all the new definitions. For example, what will replace 'probable maximum flood'? Without understanding this detail it is impossible to judge whether or not the goals that we need will be supported by these regulatory changes.

It is excellent that 'aquatic resource functions' has been defined to include hydrologic, geochemical and habitat functions. Hopefully acknowledging these terms will be followed by more protection of aquatic resource functions.

It is good that crop production is recognized as important. Not all forms of agriculture are equal with regard to effects on ground water. Regenerative agriculture restores organic material to soil and helps reduce runoff of rainwater, with no addition of herbicides or pesticides to ground water. Regenerative agriculture should be encouraged. Crop production that results in increased loss of soil and contamination with herbicides and pesticides should be discouraged.

'Project', as a newly defined term to identify the geographic area of the site which needs to be considered for the effects of a proposed project must be broad enough to encompass the anticipated significant increases in precipitation. There should be a built in adjustment for future years.

Waivers of permit requirements should not be allowed for any industrial activities or industrial structures that could potentially contaminate ground water or flowing water. In particular, gas and oil pipelines can not be exempt.

A requirement to identify all public water wells within a one mile radius of a proposed project is inadequate. Many residents of rural Pennsylvania are served by private wells. These should be included in review of a proposal to deposit dredged materials. The radius to be considered should be at least 10 miles because underground fluids have travelled at least nine miles and produced adverse effects. Products of fracking have not been defined as hazardous in PA law. However, waste water or brine from fracking contains toxic chemicals and radioactive material and must not be allowed to be deposited in injection wells. Such wells can easily contaminate the aquifer.

Thank you for the proposed changes that will help trail associations, conservation and environmental groups.

Our freshwater resources are extremely valuable and must be protected from chemical and radioactive toxins. Already inappropriate wastewater treatment has contaminated rivers that are the source of drinking water for many people. It is much better to prevent this disaster than to attempt to clean it up. Contamination of an aquifer is disastrous. Every proposed project, not only those immediately adjacent to a waterway, should be carefully examined for its potential effect on our water resources.

Thank you for your attention and your work on these issues.

Sincerely,
Barbara W. Brandom, M.D.
1118 King Ave., Pittsburgh, PA, 15206
e-mail bwb131252@gmail.com

