

May 14, 2019

Members of the Environmental Quality Board  
Honorable Patrick McDonnell, Secretary of Environmental Protection, Chairperson  
16th Floor, Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Dear Secretary McDonnell:

My name is Luke F. Brubaker, and I am the founder of Brubaker Farms, a member of the Pennsylvania Department of Environmental Protection (DEP) Climate Change Advisory Committee, and a member of the Board of Directors of the Pennsylvania Farm Bureau (PFB).

As a long-time farmer, I am greatly concerned with the Department's proposal to increase fees for Water Quality Management (WQM) permit applications and National Pollutant Discharge Elimination System (NPDES) permit applications and annual fees. The increased costs for permits will only place a greater burden on farmers now struggling to make a living and will do little to improve water quality or the climate.

Instead, farmers need increased funding to assist with the installation of water quality projects that will improve the environment, not rising permit fees and other changes to permits that will take additional scarce. Our goal should be to keep farmers farming, and the proposed increases will do nothing to help in that regard. I can state emphatically that this will discourage my operation from moving forward with improvements that would further augment water quality.

In closing, I want to again state that raising permit fees as contemplated in the Department's proposal will have the opposite of the intended effect. Thank you very much for your consideration of these comments.

Sincerely,  
Luke F. Brubaker  
Brubaker Farms  
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Mount Joy, PA 17652  
717-575-6111