

Pennsylvania Farm Bureau

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Technical Guidance Coordinator
Department of Environmental Protection
Policy Office
Rachel Carson State Office Building
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To Whom It May Concern:

Pennsylvania Farm Bureau (PFB) is pleased to offer its comments on the interim final technical guidance document, “Stormwater Management for Agricultural High Tunnels” (DEP ID#383-4200-001). PFB is a general farm organization, made up of more than 62,000 members. Since 1950, PFB has provided support, advocacy and informational and professional services for Pennsylvania agriculture and farm families, including those who may utilize high tunnel structures to carry out temporary agricultural activities.

Given the existing statutory and regulatory requirements governing the use of high tunnel structures in Pennsylvania, including those added to the Storm Water Act by Act 15 of 2018, PFB questions the need for the “additional recommended construction and operational criteria” for such structures included on page 4 of the interim final guidance document, especially given the potential for “municipalities or others” to, intentionally or not, interpret provisions that the Department intends solely as guidance as serving a regulatory purpose (notwithstanding the Department’s disclaimer on page 1). For that reason, we recommend that those additional criteria be deleted from the guidance document.

Thank you very much for the opportunity to comment on this document.

Sincerely,



Grant R. Gulibon
Director, Regulatory Affairs