

TESTIMONY OF THE PENNSYLVANIA FEDERATION
OF SPORTSMEN'S CLUBS, INC.

COMMENTS ON WETLAND PROTECTION AND CURRENT PROPOSALS

PRESENTED TO THE PENNSYLVANIA HOUSE
ENVIRONMENTAL RESOURCES AND ENERGY COMMITTEE

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My name is Mark Henry and I am here to present testimony on behalf of the members of the Pennsylvania Federation of Sportsmen/s Clubs.

The Federation, for many years, has recognized the value of wetlands and the need to implement an effective and efficient wetland protection program. The values that we recognize include their critical role in protecting property through flood control, ability to improve water quality and supply, provide a food supply, and serve important ecological functions for the state's fish, wildlife and plant resources. It is unfortunate that in years past, these wetland values were not recognized and much of the Commonwealth's wetlands were degraded and even destroyed resulting in lost economic opportunities, property destruction and a loss of our natural heritage.

The Federation further believes that wetland protection programs need to reflect a balanced approach that conserves and enhances wetlands, supports the rights of all property owners (not just those who want to misuse their property to the detriment of others), provides for economic interests, and makes provision for essential public infrastructure.

As a result of our beliefs, the Federation embraces and promotes the concepts of wetlands education programs, wetland restoration and enhancement programs and effective and efficient wetland protection programs.

Having outlined the Federation's overall wetland philosophy, I would like to address three specific proposals that are of importance to the Federation.

First item is the recent legislative proposals to redefine wetlands as lands that have water present at the surface at least 21 days during the growing season. This redefinition will eliminate at least 75% of the remaining wetlands in Pennsylvania from the permit program. These proposals also include a classification system that will further remove from protection another large acreage of wetlands. These proposals run counter to the National Academy of Sciences report which does not recommend a classification system, considers facultative as well as obligate wetland vegetation, and recognizes subsurface water saturation in determining wetlands. The Federation believes it is important to base all wetland programs on good science rather than arbitrary and unscientific

proposals. Thus, we strongly support the recommendations of the National Academy of Sciences rather than the unscientific legislative proposals.

Second, we are concerned about the cumulative loss of wetlands and the recent proposal to exempt up to 1/2 acre fills from the permit process. While we recognize the need to accommodate homeowners who unknowingly purchased a lot in wetlands, we believe the 1/2 acre exemption is larger than it needs to be. In conversations with Monroe County Conservation District personnel and other wetland scientists, the vast majority of problems could be resolved with a 1/10th acre exemption (for lots purchased prior to October 4, 1984). This we feel is a more appropriate approach and is the one we support.

Lastly, the Pennsylvania Department of Environmental Protection has proposed forming a 'Wetlands Management Advisory Committee' for the purpose of consulting with the Department on 'rules, regulations, policies, procedures and other actions that affect wetlands within the Commonwealth.' The Federation supports and welcomes the formation of such a Committee and would like to be included. We believe that such a Committee will provide for a broad diversity of interests to be able to discuss proposals and reach a common consensus. With this consensus, we can provide for practical and workable wetlands programs and avoid unscientific and radical programs.

I thank the Committee for the opportunity to testify and I would be happy to answer any questions the Committee may have.