



April 8, 2019

To: Members of the House Environmental Resources and Energy Committee  
From: John Walliser, Pennsylvania Environmental Council  
Re: Opposition to House Bill 414 (P.N. 387)

Dear Representatives:

The Pennsylvania Environmental Council (PEC) respectfully requests that you oppose House Bill 414 (P.N. 387) as currently written. While we support permitting transparency and accountability, we believe this legislation is problematic due to ambiguity and potential delegation of permitting authority.

Our concerns include:

- Section 4(b) of the legislation [Page 2, Lines 22 to 27] could be read to mandate permit approval within 20 days if the application is signed by a licensed engineer – regardless of whether the permit application is complete or in compliance with applicable law. PEC opposes any deference or delegation of permitting authority to private interests. Further, the legislation is unclear as to whether the decision timeframe requirement begins only after an application is determined to be administratively complete.
- A similar ambiguity with respect to the decision timeframe complicates Section 4(a) of the legislation [Page 2, lines 12 to 21].

For these reasons, we ask you to oppose this legislation.

Thank you for your consideration.

John Walliser  
Senior Vice President, Legal and Government Affairs  
Pennsylvania Environmental Council