



March 4, 2014

To: Members of the Pennsylvania House of Representatives
From: John Walliser, Pennsylvania Environmental Council
Re: Opposition to House Bill 1576 (P.N. 2647)

Dear Representatives:

On behalf of the Pennsylvania Environmental Council, I am writing to express our strong opposition to House Bill 1576 (P.N. 2647), which would fundamentally impede endangered and threatened species protection in Pennsylvania.

The issues cited by those speaking in support of this legislation concern permit review and Pennsylvania Natural Diversity Inventory (PNDI) consultation process with the Fish & Boat Commission and the Game Commission. **House Bill 1576 makes no actual changes to the current permit review process** – instead, it places political hurdles in front of new species listings, and imposes unclear standards on listing determinations and data sharing. It also systematically drops hundreds of species of concern from the permit review process, irrespective of their status in the state, welcoming potential federal listings in the future.

In other words, House Bill 1576 does nothing to address the stated problems with permit reviews.

The legislation also ignores recent key developments intended to improve the PNDI review process:

- In May 2013, the Department of Environmental Protection issued updated policy guidance for PNDI coordination during permit review and evaluation [Document Number 021-0200-001]. This policy, which has been in place less than a year, clarifies the PNDI consultation process and establishes clear determination guidelines.

- The Department of Conservation and Natural Resources, in partnership with both Commissions, is already undertaking an overhaul of the PNDI system that will provide valid permit applicants with greater access to species data as well as the ability to expand the scope of environmental review for proposed projects.

Both of these efforts will help facilitate more efficient permit review without sacrificing species protection in Pennsylvania.

Without question, there are opportunities to improve transparency and partnership between resource protection agencies and permit applicants. But these goals can be achieved without the need for legislation, and it is our understanding that the resource protection agencies are now diligently working with members of the General Assembly to identify concrete concerns and develop tangible solutions.

On behalf of our membership, we urge you to oppose this legislation.

Thank you for your consideration.