

Dear Commissioners,

Protecting the watershed and the health of the environment and citizens is of the utmost importance. Additionally the voices of concerned citizens should be valued above those of industry lobbyists.

In a press event at COP23, Robert Howarth, the David R. Atkinson Professor of Ecology at Cornell University said, "Methane is an important greenhouse gas and is currently responsible for an amount of global warming equal to approximately 60% of that caused by carbon dioxide. Methane reductions offer one of the few available approaches to immediately slow the rate of global warming, since the climate responds more quickly to decreases in methane compared to carbon dioxide." A ban on fracking in the Delaware River Basin is an important step in limiting methane emissions, but allowing water withdrawals and the processing of fracking waste in the Basin will only enable more fracking and, therefore, more methane leaks outside of the basin.

Transmission lines have served as the conduit that connects fracking in Pennsylvania to power plants, processing facilities, export facilities, and other infrastructure projects that have spread through the state and across its borders into neighboring states. In the final report of the Pipeline Infrastructure Task Force, PA DEP chief John Quigley said that within a few years, "In the next decade, Pennsylvania will undergo a substantial pipeline infrastructure build-out to transport gas and related byproducts from thousands of wells throughout the state.... The result will impact communities and the environment in every PA County." The DRBC's draft regulations do not address pipelines or any of the other infrastructure build-out occurring in the basin. Nevertheless, the regulations that would allow fracking waste to be brought into the basin and clean water to be taken out enable more fracking. And more fracking means more pipelines, more infrastructure., When a site is developed for gas well development, the change is dramatic, essentially transforming the land to an industrial landscape. The result is destruction of acres of vegetation (8.8 acres per well pad in 2011 with 30 acres of forest impacts due to edge effects, more than double that is the trend today), soil compaction and destruction of the natural land contours, alterations to watershed drainage patterns, and hydrologically connected systems such as wetlands and vernal pools. Habitats and complex ecosystems are disrupted or lost. 85% of the Upper Delaware where the Marcellus Shale is located is forested. Forest destruction and fragmentation in turn destroys the ability of the forest ecosystem to capture, clean, and infiltrate precipitation, removes the trees that sequester carbon, reduces biodiversity, encourages invasive species, and destroys vital habitat., Changes to stream water quality occur where gas drilling and related activities are located. For instance, a publication of the Proceedings of the National Academy of Sciences found streams adjacent to gas wells are negatively impacted by runoff and sedimentation (Total Suspended Solids), harming benthic life, fish and wildlife and causing streams to be eroded and destabilized. DRBC follows the state's stormwater rules where a project is located, leaving loopholes in current nonpoint source laws that allow fracking activities to escape strict oversight. This would be a recipe for disaster if fracking were to occur, which is why it must be banned in the Delaware River Watershed.

The Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking's authors cite a 2017 study which found that “fracking wastewater discharged into rivers and streams through treatment plants created dozens of brominated and iodinated disinfection byproducts that are particularly toxic and “raise concerns regarding human health” (pg 18).

Sincerely,

Meg Turner