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I am writing to urge DRBC to issue regulations to completely and permanently ban fracking, hydraulic fracturing, for natural gas and fracking related activities including water withdrawals and wastewater processing, storage and discharges throughout the Delaware River Watershed.

The DRBC's proposed fracking regulations could open the Delaware River Basin to the removal and transfer of freshwater out of the basin, known as an "inter-basin transfer," for use in fracking operations elsewhere, pending the Commission's approval. This would be a devastating mistake with impacts across the region.

There are many documented harms of inter-basin transfers, including:

- Reduced flow rates in the donor basin: Decreased supply in the donor basin can result in changes to a waterbody's natural flow patterns, with impacts to native vegetation and aquatic habitats, including in wetlands. This loss in biodiversity can expose a waterbody to an influx of invasive species, which can further harm local habitats.[6] The Delaware River Basin is a sanctuary to rare and endemic species of plants and animals including bears, bald eagles, native trout, freshwater mussels and eels, and endangered timber rattlesnakes, all of which would be threatened by shifts in the watershed's freshwater flow patterns.
- Reduced ability of the donor water body to assimilate pollutants: A waterbody with less supply has a decreased ability to dilute pollutants and could harm aquatic species due to heightened toxic exposure.[7]
- Unsustainable development of a limited resource: Inter-basin transfers put donor waterbodies that people depend on for drinking water at risk and can enable development in regions that do not have readily available water. The Delaware River Basin is the drinking water source for over 17 million Americans, including residents of Philadelphia and New York City. Removing water from the basin would threaten the region's water security.

The gas that would be extracted using Delaware River Basin water would only serve to increase the acceleration of greenhouse gas emissions that drive climate change.

Should the DRBC permit inter-basin transfers of water for fracking elsewhere, it would highlight a contradiction in how it views water management. The harms of fracking are well documented, and include health risks, industrialization of communities, climate change impacts, among others. The DRBC has acknowledged these risks in its rulemaking notice on the latest proposed fracking regulations. These risks do not only apply within the Delaware River Basin, but in other watersheds as well. For a donor basin to ban drilling, only to transfer water for this same practice in other locations where it is permitted is contradictory.

The Delaware River Basin Commission must provide the protections the Basin deserves and move forward with a full ban on fracking, inclusive of drilling, inter-basin transfers and the treatment, storage and discharge of fracking wastewater.