Gerard Dowd

Article 5 of the Delaware River Compact has no bearing on pollution control because the Clean Water Act "has fully occupied the field of interstate water pollution, " thus superseding it. The claim that landscape changes associated with high-volume hydraulic fracturing "will reduce forested areas and potentially vegetated buffers, increase non-point source pollution, diminish groundwater infiltration, and risk adversely affecting water quality and quantity in surface and groundwater, " is ridiculous in light of the fact that Pennsylvania and New York already have the toughest erosion, sedimentation and storm water management regulations anywhere, which completely address this issue and often lead to reduction of existing storm water flows. Wayne County has added nearly 45,000 acres of forest since 1959, far more than would ever be removed by natural gas development. There is no need for further regulation. If this is all it takes for the DRBC to ban a legitimate land use, then it opens the door for them to ban any land use they choose including agriculture, quarrying, construction, forestry, or commercial and residential development.