

Daniel L. Alters

As an environmental regulator with the PA DER/DEP for 35 years, and a resident of Lycoming County until 2016, I can attest to water quality issues created by the Marcellus gas industry. When given the opportunity, every operator I am familiar with will push the environmental regulations affecting their operations into the area of non-compliance. In spite of their few efforts to comply, pollution incidents will occur. Some will be minor, some will be catastrophic. Preventing the pollution that inevitably results from Marcellus natural gas operations mandates the prohibition of gas drilling entirely in the Delaware River basin. DRBC must make the ban total and permanent.

Article I § 27 of our State Constitution guarantees our right to clean air and water, among other significant protections. I was a small part of the lawsuit that resulted in the decision supporting that amendment before the Commonwealth and Supreme Courts of Pennsylvania, and I will never stand idly by should any entity choose to engage in polluting activities. The water quality of the Waters of the Commonwealth are protected by Article 27 and must not be polluted, from any man-made source.

The DRBC has proposed Regulation 440.5 that is intolerable. There are already many sources of contaminated wastewater within the watershed, and no additional wastewater from outside the watershed should be imported for treatment and/or disposal. The interbasin transfer of water has been an hot-button issue for many years, and I expect the DRBC to take the conservative stand and prevent any and all activities that imperil the Delaware River.

Contaminated fluids from the drilling and fracking operations have proven to migrate from the drill pads and contaminate both surface and groundwater. I cannot tolerate proposed regulation 440.5 and it should be deleted from your proposal. It makes little sense to allow frackwater fluids to be brought in to the Delaware watershed.

Natural gas development has degraded Pennsylvania streams. Spills, deliberate dumping of frackwater flowback, transportation crashes, and the effects of woodland fragmentation have contaminated many coldwater fisheries. I urge the DRBC to ban all gas drilling in the Delaware River watershed.

It has been proven that Marcellus gas operations have adverse health impacts on families living in the immediate area of the operation. While Article 27 of our State Constitution guarantees our right to clean air. A ban on gas drilling within the Delaware River watershed will prevent impacts on people as well as constitutional challenges to DRBC regulations.

Studies by Margaret Brittingham and others have determined negative impacts on bird life from Marcellus gas development activities. The National Academy of Sciences found that watersheds in the vicinity of gas wells to be negatively impacted by runoff and sedimentation, et al., destroying the macrobiotic aquatic life, fish and other wildlife. The DRBC must be certain this does not occur within the Delaware River watershed.

Marcellus gas activities near Dimock, PA, have demonstrated the likelihood of water well contamination by Marcellus gas production activities. Folks living within the Delaware River watershed cannot abide by having their wells contaminated by gas drilling activities.

There is no immediate need for additional natural gas development in this world. The negative

impacts of climate change are occurring now, far earlier than anyone would have expected. Additional natural gas is not necessary in this new world of alternative energy resources, and making it available on the cheap, at the expense of the Delaware River's unique natural resource, is not only counterproductive internationally, it is detrimental to Pennsylvania. Please read my comments to EPA during their carbon rule-making session in Pittsburgh.

Hearings for the Clean Power Plan for Existing Power Plants
and the Carbon Pollution Standard for Modified Sources

July 31, 2014

William S. Moorhead Federal Building, Pittsburgh, PA

"My name is Dan Alters, Conservation Chair for the Lycoming Audubon Society. I have a BS in biology and a Masters degree in environmental pollution control. I was employed for 35 years by the Pennsylvania Department of Environmental Protection, completing my career as the water programs manager. I live in rural northcentral Pennsylvania, where I regularly hike, hunt, fish, canoe, bike and bird watch. I am very concerned that these activities, which I enjoy so much, may one day be severely limited due to climate change. Thank you for the opportunity to comment on the proposed carbon rule today.

Audubon and its network of 460 chapters are committed to conserving and restoring natural ecosystems, focusing on birds, other wildlife and their habitats, for the benefit of humanity and the earth's biological diversity. I want to express our strong support for the U.S. Environmental Protection Agency's critical efforts to put limits on carbon dioxide and other pollutants from existing power plants. EPA's proposed carbon reduction targets are a strong start toward reducing emissions. We believe these pollution reductions can be achieved at a reasonable cost, a cost to our nation and the world society we believe is far less than the cost would be if global warming remains unchecked. We believe strongly that worldwide climate change will cause increased floods and drought, rising sea levels, food shortages

and famine. These in turn will create huge refugee issues for less-affected countries and likely new wars and other human strife. One only needs to review the climate change contingency plans of our own Department of Defense for a list of these possibilities.

We therefore believe more needs to be done. The proposed goal is too conservative and the plan allows far too much time for compliance. State plans should include automatic provisions to correct any shortfall in emission targets that may occur, and severe penalties for failing to meet goals. A federal review of state programs should occur at least every five years. Finally, it makes no sense to control carbon emissions in this country while we export millions of tons of coal overseas – we need to limit coal sales to countries that have acceptable plans to control carbon emissions.

Lycoming Audubon is greatly concerned about the impacts of climate change on avian species. Birds have long served as key indicator species of ecosystem health. America's 46 million bird watchers spend roughly 32 billion dollars a year, generating 85 billion dollars in overall economic output and 13 billion dollars in tax revenues. Bird watching, hunting, and other outdoor activities enjoyed by more than 80 million Americans, support over 2.6 million jobs. These jobs are at risk if EPA does not effectively control carbon emissions.

Lycoming Audubon commends the EPA for its leadership on this critical issue. We fully support the proposed rule and would urge EPA to make it even stronger. Thank you for considering these comments."

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