

Sharon Furlong

As Spokesperson for the Bucks Environmental Action group, and someone who had written numerous comments to the DRBC, and has made numerous in-person and on-Zoom 2 and 3 minutes mini speeches, I must write that my understanding the material and the intent of these procedure and rule changes is the exact opposite of what I have been so lucky to be allowed to do: directly participate in decision-making around and about issues that affect me and the members of BEA, who reside in Bucks County, a part of the Delaware River Watershed.

It is my understanding that more power through these rule changes would be granted to administrators, especially to the Director, which bypasses the State Representatives and erodes direct public access to decisions before they become irrevocable. It is my reading of the perhaps unintended consequences of this set of changes, that the capacity for there to be unilateral decisions made in the proverbial "back room" might become more of the way the Commission conducts itself, in direct opposition to its sterling and transparent history since being established in the 1960's. This is an enormous shift in power. It is an enormous shift in perspective. It is also completely shatter decades of precedence.

Why? Why is this happening now? Climate change us upon us. Political uneasiness and indeed, the beginnings of instability in the past several years, both in this nation and certainly around the world, dictates that these are times when transparency must be safeguarded from all attempts to reduce or remove it. In addition, these torrid times demand robust public involvement and this can only be done through transparency and the retaining procedures that enshrine that public participation. Evil thrives in the dark. Corruption begins with the concentration of Power in the hands of the few, or even the One. Claiming that public participation can be time consuming, messy and difficult is no excuse. Democracy itself is time consuming, messy and difficult. However, the alternative is fascist-like governing strategies, and therefore, fascism. This is not America.

It is easy to get lost in the minute details of these suggested rule and procedure changes. However, we at BEA wish to point out one aspect that we strongly believe illustrates everything being written about in this comment.

One of the proposed changes states that The Executive Director is given the power to decide when a change to a project is "material" (significant) enough to warrant a through review. In addition, the Executive Director is given carte blanche power to decide what goes into an acceptable application, whether a submitted application is therefore acceptable, and when it is complete....all without participation from the Governor-appointed Commissioners, who are representatives of the Voting Public...and who are supposed to be an intimate part of all of these processes. These processes decide what gets done and what does not. If the Commissioners are bypassed, we are bypassed. Whose definition of "material enough" are we to use? One person's? This is not just a word, it is the key to what comes before the DRBC, what gets approved, what does not, what does and doesn't see the light of day. If all of that gets pushed into the back room, how is this not a dangerous concentration of power in the hands of one or two or three people? Frankly, it IS a dangerous concentration of power and it destroys transparency. Therefore, it wholly uproots the Public's capacity to learn what just might significantly change their lives. This is not democracy. Frankly, it is not even the way this Commission has done its job all of these long years. Again, we must

question: Why is this happening and why now?

Stop this process right now. Do NOT codify and enshrine dangerous rule and procedural changes such as these. This is a wolf masquerading as a lamb. It must cease.