

Barbara Arrindell

B. Arrindell here. I'm director of Damascus Citizens for Sustainability, or DCS, from Milanville in the Delaware River Basin. I want to make two points. First, DRBC's origin and the moving force behind it has been a concern for health, the health of the people who live here, the very public, these rules changes seek to exclude from its decision-making. Projects within the basin and within the purview of the Commission to allow or not allow and under what conditions can and will deeply impact the public and public health both near and downstream from the projects being considered.

And second, the narrowing of the DRBC decision-making process to exclude or minimize public input, public knowledge of DRBC decisions, and decision-making process actually will weaken the Commission's ability to protect the resources of the Basin. Protecting these resources is why the DRBC exists.

A unitary executive, top down, behind the scenes, hidden process, will make the DRBC less effective, less knowledgeable of conditions it needs to know about. And, by disengaging the public coupled with changing the freedom of information law rules, so DRBC's hidden activities are not discoverable, these crucial decisions are also hidden. Decisions that directly affect the quality of our environment, our drinking water, our air quality, the diversity and health of the Delaware River, its species, habitats, ecosystems, tributaries, and communities throughout the entire watershed.

We cannot effectively take part and influence outcomes if the decision-making process is not open and interactive with all important decisions. And the underlying information about them fully disclosed and available for review and comment. We also want the DRBC Commissioners to be hands-on involved and engaged with the decisions that are made, as these representatives of our elected government are accessible to us as members of the public and they are required to respect our rights and protect the environment for the public good.

That is not what this rulemaking proposes to do. In fact, it does the opposite in almost all of its proposed sections. Please reconsider these rules changes and don't break what is not broken. A little more on that first point. The DRBC originated out of INCODEl, the Interstate Commission on the Delaware River, a voluntary arrangement among the Basin states' Departments of Health, yes, health, that sought to promote health of its residents, human and otherwise, solve existing environmental problems, and prevent additional hurtful contamination, pollution, or destruction of the basin. DRBC must not set up a situation where ease of corporate decision-making is more important than doing the job it was assigned to do in its formation and has been doing a pretty good job along the way to today. The Delaware is much cleaner than when the DRBC was formed. Please reconsider these rules changes and don't break what is not broken and we will be submitting additional written comments. Thank you. B. Arrindel, DCS.