

Lindsey Turner

I am a lifelong Pennsylvania resident and a proud ally to an environmental justice group in the city of Chester. We are having the same fight on our part of the Delaware river against LNG as is Gibbstown. The EPA and DEP have done nothing to protect our people. They claim they cannot change the law and can merely encourage large companies make accessible public hearings and publish public reports that account for ALL testimonies.

The Executive Director is given far too much authority over many crucial decisions and these are made behind closed doors, without the public and without a vote by the DRBC Commissioners. These include: the power to decide whether or not a change to a project is "material" (if it is "materials" it would open up for more robust review); and decisions about the submission of applications for projects, what is required in an application and when an application is complete; the extension for some permits for as many as 5 additional years. We cannot wait 5 years of poison before revisiting projects. We need a more dynamic system.

Extension of Permits without an expiration date are given favored status, such as the Gibbstown LNG Export terminal docket. The Executive Director is being invested with exclusive authority regarding extension of permits that removes public input completely and relieves the Commissioners of their responsibility to review and approve extensions. This legitimizes the behind-the-scenes decision making that undermines government accountability and public trust.

The subjective and value-loaded term "Material Change" and "Materially" are used throughout the proposed rulemaking – yet no clear definition is available, only a bureaucratic explanation. This terminology is not easily understandable and clouds objectivity in decisionmaking. It allows for varying interpretations for different projects, which is unfair, including unjust for the public who must live every day with the decisions that are made.

Please remember your job is to protect the people and their right to clean water. Be better and be a role model. I demand transparency and active advocacy. We cannot permit more dangerous facilities on our waterfront.