



LEAGUE OF WOMEN VOTERS®  
OF PENNSYLVANIA

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Public Comment  
League of Women Voters of Pennsylvania  
To the  
Citizens Advisory Council  
Of the  
Department of Environmental Protection  
July 16, 2013

Good morning, I am Roberta Winters speaking on behalf of the League of Women Voters of Pennsylvania. It is a pleasure to see newly appointed members here today and welcome Terry Dayton and Nancy Perkins in their leadership roles. We are most appreciative of the efforts of former chair John Walliser, and members Jolene Chinchilli and Gail Conner who are being recognized in today's resolutions. The League is also grateful for the receptivity of this Board in response to League comments. This month's agenda includes several issues that are among our natural resources priorities.

The League of Women Voters of Pennsylvania last month joined others by adopting by concurrence the Great Lakes Ecosystem Position of the League of Women Voters of Michigan. It is attached for your review. Fundamentally, we support *the preservation of the Great Lakes Ecosystem through coordinated efforts of conservation, water pollution prevention, and maintenance of high water quality standards*. We are most interested in finding out more about the Pennsylvania Coastal Zone Program for Lake Erie.

The League is fortunate, as are some of you, to be a part of the upcoming workgroup of Technical Advisory Board meetings regarding issues related to the draft proposed rulemaking 25 PA Code, Chapter 78, Subchapter C (Surface Activities). We believe that today's report by Mr. Erb should be most timely as we reflect on the State Review of Oil and Natural Gas Environmental Regulations (STRONGER). The League supports the maximum protection of public health and the environment in all natural gas operations.

As many of you are aware, the League has long been recognized for our Water Resources Environmental Network. Thus, Ms. Daniel's comments regarding the State Water Plan Update and Private Water Well Construction Standards are most relevant to our continued educational efforts. We recognize that Pennsylvania and Alaska are the only two states that do not regulate

private homeowner water wells. While information provided by DEP on its website is quite comprehensive, now is an opportune time to move toward such regulation. Given on-going concerns about water quality and contamination, the League encourages you to recommend needed regulation for legislative action. It may also be prudent to encourage natural gas companies to coordinate drilling needs with available water supplies as has been done by a consortium of companies in the Barnett Shale. We cannot assume that our current abundance of water will continue and that competing demands for its use will disappear.

The League would like to take this opportunity to applaud Mr. Hess for his outreach to improve the public participation policy of the Department. Civic participation is a core value for the League. During recent weeks we all have become increasingly aware of both the risks and benefits of computer-assisted communication. Please provide opportunities to assure that citizens will have alternative ways to send and receive information relevant to critical areas of decision making impacting our environment. Clear options and protocols must also exist in the event that power shortages, computer glitches, weather conditions, or other unforeseen events prohibit those who wish to provide input from meeting a pre-determined deadline.

Thank you for your on-going consideration.

**League of Women Voters of Pennsylvania**  
**GREAT LAKES ECOSYSTEM**

**Position in Brief**

Support the preservation of the Great Lakes Ecosystem through coordinated efforts of conservation, water pollution prevention, and maintenance of high water quality standards

**Background**

Based on the need for unified efforts to protect the Great Lakes Ecosystem from a myriad of risks, the League received a request from the LWV of Michigan and voted to adopt this position by concurrence at the 2013 State Convention. Relevant informational materials were distributed to local Leagues that guided delegates in adopting the position to educate and focus advocacy with one voice on issues of shared concern. The position was adopted 1974, 1981; title amended 1985, Great Lakes Diversions and Consumptive Uses Position and Great Lakes System Position combined 1988; updated 2005 by the League of Women Voters of Michigan.

*Updated July 2013*

**Position in Detail**

The League of Women Voters of Pennsylvania supports preserving and enhancing the environmental integrity and quality of the Great Lakes-St. Lawrence River Ecosystem. We support the attainment and maintenance of high water quality standards throughout the Great Lakes Basin, with emphasis on water pollution prevention. Water conservation should be a high priority of all governments in the Basin.

**Protective Measures**

To achieve protection and improvement of this valuable, international resource, the League of Women Voters of Pennsylvania supports efforts to:

- Limit uses of "fragile," historical, cultural and scenic shoreline areas;
- Preserve wild and pristine areas within the watershed, with no new development in these special habitats without adherence to strict criteria as prescribed by federal, state, or local governments;
- Provide for appropriate recreational opportunities in ad public access to sensitive areas without destruction or harm to the ecosystem;
- Protect the quality of the air and waters of the ecosystem by strict adherence to agricultural, industrial, residential, environmental and commercial zoning regulations that prohibit the introduction of toxic or polluting discharges or detrimental land use techniques within the Basin;
- Protect the remaining dune formations and enforce strict regulations of sand dune mining development on the dunes;
- Strengthen upstream land management to eliminate sources of siltation and pollution; and
- Control the invasion and spread of non-native aquatic and terrestrial nuisance species.

**Threats to the Ecosystem**

The League of Women Voters of Pennsylvania opposes the following activities as they can lead to the degradation of the special natural resources of the Great Lakes Ecosystem:

- Inefficient or excessive water uses (Proposals for new or increased withdrawals within the Basin, e.g. for agricultural or municipal uses, should be carefully evaluated before being permitted. Withdrawals should be regularly monitored for potential or actual damage to the ecosystem.);
- Destruction of marshes and other wetlands through the watershed (Mitigation should be accepted only as a last resort. Mitigation proposals should be rigorously evaluated and projects should be strictly monitored to assure no net loss of the ecosystem);
- New or increased diversions or transfers by any means of Great Lakes waters and adjacent groundwaters to a place outside the Basin (Projects already in place should be carefully monitored and restricted if there is evidence of damage to the ecosystem.);
- Dredging and filling of river inlets, harbors, lakes or wetlands except for tightly-controlled, non-degrading and non-repetitive activities; and
- Discharge to air or water of toxic pollutants and other material from industrial, agricultural, residential or commercial operations that may damage the ecosystem in violation of laws and ordinances.

### **Public Participation**

The League of Women Voters of Pennsylvania supports informed and responsible action on behalf of the preservation of the Great Lakes Ecosystem. Relevant information should be readily available to the public. Opportunities for public input should be timely, accessible, convenient and well advertised.

### **Role of Government**

The League of Women Voters of Pennsylvania supports:

- Coordination of functions among various governmental agencies charged with protecting the Great Lakes and elimination of unnecessary overlap;
- Use of area-wide coordinated management plans and techniques in the solving of Great Lakes Ecosystem problems;
- Participation by all affected governments in the Basin in review and decision-making on Great Lakes agreements and projects, facilitated in open meetings and hearings;
- Strengthening of existing mechanisms for intergovernmental discussions and decision-making;
- Separation of responsibility for submitting recommendations for governmental projects from issuing permits for such projects; and
- Monitoring and enforcement of treaties, ordinances, laws, and master plans.

### **Research Priorities**

- Effective, non-toxic control and removal of invasive aquatic and terrestrial species;
- Restoration of health to the overall resource;
- Survival of native aquatic and terrestrial species and their nutrient sources;
- Continual testing of Great Lakes water quality for impact from the following: pesticides and fertilizers, resistant bacteria, persistent pharmaceuticals and other chemicals; and
- Evaluation of water accountability systems, groundwater monitoring and water use planning and conservation efforts throughout the Basin.

*Adopted June 2013*