



**LEAGUE OF WOMEN VOTERS®
OF PENNSYLVANIA**

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**Public Comment
League of Women Voters of Pennsylvania
To the
Citizens Advisory Council
To the
Department of Environmental Protection
March 18, 2014**

Good morning. I am Bonita Hoke, Executive Director of the League of Women Voters of Pennsylvania. The League welcomes the opportunity to provide input into your strategic plan and priority setting that you will be addressing today.

The League believes that the keystone of your strategic plan and the number one priority for the Department should be a review of all programs, policies, and procedures in light of Article 1, Section 27 of our Constitution,

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

This must go beyond a legal review. Such a process requires coordination with an eye for erring on the side of preservation and protection rather than degradation and hoped for remediation. To do so, the League proposes that the Office of Program Integration, established in 2011, needs to be reformulated. Emphasis on efficiency, consistency, and metrics of evaluation need to be minimized. Significant efforts should be extended on integrating all Department activities to focus on this shared mission. Central to all activities should be an unwavering commitment to preserving clean air and pure water – our most precious resources. The Bureau of Air Quality, the Office of Pollution Prevention and Energy Assistance, the Environmental Cleanup and Brownfields Program, the Office of Active and Abandoned Mine Operations, the Office of Oil and Gas Management, the Bureau of Radiation Protection, the Bureau of Waste Management, the Office of Water Management, the Permits, Licensing, and Certification Center, and the Public Participation Center all have a role to play. Each one must act in concert with the other as a trustee of our common property and safeguard it for the future. For example, acid rain that degrades our waters is a result of air pollution, and changes in permit processes and procedures can promote undue risks to both air and water quality. Both air and water are bellwethers of climate change. Thus, it is

imperative that each office operate according to the often-cited precautionary principle.¹ Basically this means, “When in doubt, don’t!”

As you look to the future of the Department, the League would also like you to reflect on the impact of a data-driven, accountability based systems on an evolving natural world. Is the department measuring the right things? Do we have the right tools to determine that which is significant? Are efforts to dilute, ignore, or eliminate the right regulations ill advised? For example, in reviewing the data provided by the Office of Program Integration, it is clear that great strides have been made based on the quarterly reviews of the Permit Decision Guarantee. In fact, when measured in permits meeting targets and/or guaranteed timeframes, there is a respective 96% and 95% increased predictability. In reviewing the fewer average number of days to process requests, improved efficiency has grown from 9% to 37% dependent on the permit type (Waste, Air, Radiation and Remediation, oil and Gas, Water, and Mining). While some may celebrate such improvements in “efficiency and effectiveness,” the proof is in the pudding. Please talk to your friends who fish, hike, bird-watch, and hunt in our Commonwealth. With their feet on the ground and their eyes on our surroundings, do they believe that the Department has grown more efficient, effective, and consistent in maintaining our resources for the benefit of all the people? Technology is a double-edged sword – it can be used to obfuscate or clarify. It is imperative to achieve the latter. Data, charts, and graphs can be used to show only part of the picture, when a comprehensive view is essential to understand all of the ramifications and then to act on that knowledge for the protection of our people and environment. The League asks you to look at the right data from the right sources to make the right decision.

The League’s long-standing commitment to natural resources at local, state and national levels prompts us to be a voice for citizens and a force for change. We hope our convictions will prompt you to stop and ask, “Are we doing all that we can do to preserve clean air and pure water for generations yet to come?”

Thank you.

¹ According to Wikipedia, *The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is not harmful falls on those taking an action.*