



LEAGUE OF WOMEN VOTERS®
OF PENNSYLVANIA

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The League of Women Voters of Pennsylvania
Public Comment to the
Citizens Advisory Committee of the Department of Environmental Protection
Harrisburg, Pennsylvania
April 21, 2015

The League of Women Voters of Pennsylvania appreciates the opportunity to reinforce the need for this Department to protect and conserve our natural resources and public health. As you reflect on the items before you, we hope that each of you, during this time of spring renewal, might act to promote this essential mission to sustain the long-term interests of the citizens of this Commonwealth.

First, there is the report regarding National Governor's Association Technical Assistance Plan for States to Implement EPA Section 111(d) Clean Power Rule. At the national level, the League *strongly supports the proposed Carbon Pollution Standard for New Power Plants and commends the EPA for taking this crucial first step to reduce carbon dioxide (CO₂) emissions from large power plants that are built in the future.*¹ We further believe it is urgent and essential that we move beyond these standards given the economic consequences and human costs related to climate change. *The U.S. must take aggressive action to reduce greenhouse gas emissions from all sources, with emissions reduction targets of at least 20 percent below 1990 levels by 2020 and 80-100 percent below 1990 levels by 2050. Reaching these targets will be difficult unless current power plants dramatically reduce their carbon emissions either by capturing and sequestering emissions, by changing fuels, or by shutting down completely.*² Given that Pennsylvania is the third ranking state for annual CO₂ emissions,³ this department should embrace the challenge individually and collectively with its neighboring states to fully meet these rules.

Secondly, we wish to reinforce our concerns about the importance of riparian buffers addressed by the guidance documents. We are eager to learn more about demonstrating equivalency. We have reservations about the long-term consequences of offsetting to our water quality – particularly in high quality or exceptional value watersheds. We can ill afford further pollution, erosion and flooding in our Commonwealth. Given that development is only one of a myriad of factors impacting our waters, critical safeguards

¹ <http://lwv.org/content/lwvus-comments-proposed-epa-carbon-rule>

² <http://lwv.org/content/lwvus-comments-proposed-epa-carbon-rule>

³ http://en.wikipedia.org/wiki/List_of_U.S._states_by_carbon_dioxide_emissions

must be provided by this Department. The League advocates for such protection based on our strong, national position on water resources.⁴

Chapter 78 regulations for surface activities at natural gas sites, the third item on today's agenda, have been long in coming. We applaud the Department for its efforts to encourage public participation with extensions of timelines for comments and public hearings. As we continue to review the documents, we hope that each of you will scrutinize these rules. Consider new technologies, the additional wells being drilled on already producing pads, multiple fracking of existing wells, and the number and nature of on-going violations and environmental impacts that continue to be documented. The League believes regulations should provide transparency in all stages of exploration, drilling, and production stages; extend timelines and parameters for water testing; balance the rights of mineral and surface owners; and insure public input into decision-making regarding the location of facilities and related pipelines.⁵ Of course, regulations without an efficient and effective oversight system coupled with meaningful enforcement are but words. We trust that during current budget discussions you will also advocate for the resources this Department requires to insure the implementation and compliance needed to uphold not only Chapter 78 but also the provisions of Article 1, Section 27 of the Pennsylvania Constitution.⁶

Thank you for your consideration.

⁴ **The League supports**

- water resource programs and policies that reflect the interrelationships of water quality, water quantity, groundwater and surface water and that address the potential depletion or pollution of water supplies;
- measures to reduce water pollution from direct point-source discharges and from indirect nonpoint sources;
- policies to achieve water quality essential for maintaining species populations and diversity, including measures to protect lakes, estuaries, wetlands and in-stream flows;
- stringent controls to protect the quality of current and potential drinking-water supplies, including protection of watersheds for surface supplies and of recharge areas for groundwater.

⁵ <http://www.palwv.org/marcellus-shale/>

⁶ *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.*