



February 12, 2020

Delaware River Basin Commission
P.O. Box 7360
West Trenton, New Jersey 08628

**Re: DRN Comment on DRBC Water Resources Program FY 2020 – 2022;
E. EMERGENT ISSUES and Section II. WATER RESOURCE MANAGEMENT B. WATER
RESOURCE MANAGEMENT WORK PROGRAM, SPECIAL SECTION: HYDRAULIC
FRACTURING**

Delaware Riverkeeper Network (DRN) submits this comment to support our request that the Water Resource Program 2020-2022 references regarding the DRBC's plan to continue to develop natural gas regulations (page 41) be substantially changed from the draft program based on the need for a full ban to be enacted by the Commission. The draft natural gas regulations that are under review should be amended to permanently ban hydraulic fracturing (fracking), ban the storage, processing, discharge or handling of wastewater produced by fracking and prohibit the export of Delaware River Watershed water and water resources out of the basin for fracking elsewhere. Once a full and permanent ban is enacted, the Commission can remove fracking completely from the Work Plan.

DRN recognizes there is an ongoing public comment review of the DRBC's draft natural gas regulations. But this process has been taking too long. The draft regulations were issued on November 30, 2017, the public comment period closed March 30, 2018. We are approaching two years since the close of public comment, when the DRBC's comment review process began. DRN, the public and our partners in the DRBC Frack Ban Coalition have been advocating since then for the Commission to complete its review and enact a full ban on fracking and all its activities.

For the last two years, at the DRBC public meetings that include a public comment session, DRN, the public, coalition organization representatives and their members have been presenting scientific data, reports, information about fracking, frack waste, water depletion and water conservation, and climate change impacts and causes. We have also presented information about the adverse environmental, economic and public health impacts of fracking on communities where it is occurring, the environment, and future generations. The evidence has grown since the comment period closed, supporting further the need for a full and complete ban.

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To permanently ban fracking, ban the storage, processing, discharge or handling of wastewater produced by fracking and ban the export of Delaware River Watershed water and water resources for fracking elsewhere, the amendment and revision of the draft regulations should be expeditiously accomplished so the Commission can proceed to address the myriad issues that are documented in the Water Resources Program. Regarding the Section II B Work Plan, any time or resources that the Commission spends on hydraulic fracturing should be to amend the draft gas regulations to ban all aspects of fracking, its waste, and water withdrawals for fracking and complete the adoption process of regulations that implement the full ban.

As the federal Administration rolls back environmental protections and regulations, the dangers for our Watershed become more perilous. The Commission's role becomes even more important, with no time to waste. The sooner the complete ban is enacted, the sooner the essential protections that a COMPLETE ban will afford can be implemented.

DRN supports the consideration by the Commission of the impacts of climate change in Section E and supports the creation of the new advisory committee on climate change. DRN advocates that all dockets should be required to consider the greenhouse gas emissions from a proposed project and the resulting effect on climate. Since natural gas is primarily methane, and methane is 86 times more powerful than carbon in heating the atmosphere on the all-important 20-year period, the Commission should recognize natural gas as the major source of emissions that are fueling climate change, disallowing increases in greenhouse gas emissions in the Watershed.

Scientists estimate that at least 45% - 50% reduction of greenhouse gases must be achieved by 2030 in order to effectively limit atmospheric warming. "Emissions need to be halved by 2030 to limit warming to 1.5 degrees Celsius but temperatures are on track to reach double that by the end of the century even if countries' current plans are fully implemented, research by scientists shows." (<https://climateactiontracker.org/publications/warming-projections-global-update-dec-2018/>) The Intergovernmental Panel on Climate Change ("IPCC") report says limiting warming to 1.5C will require reducing greenhouse gases by 45% from 2010 levels by 2030 and that there can be no carbon emissions by about 2050. (*Intergovernmental Panel on Climate Change, Summary for Policymakers, Revised on January 2019 by the IPCC, Switzerland, ISBN 978-92-9169-151-7*, downloaded at: <https://www.ipcc.ch/sr15/>) It is of utmost importance that DRBC regulates greenhouse gases through its docket process to reduce greenhouse gas emissions and the resulting climate impacts and to protect the Basin's water resources from the impacts it discusses in Section E.

Thank you for the opportunity to comment.



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