



**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
May 21, 2014

Good afternoon, I am Bonita Hoke, Executive Director of the League of Women Voters of Pennsylvania for whom I am speaking. We are indeed pleased that today's agenda includes issues about both air and water monitoring and assessment. We have long supported regulation of pollution sources by control and penalties; inspection and monitoring; and full disclosure of pollution data.¹

Given the recent Intergovernmental Panel Climate Change report², we realize that many undesirable scenarios are possible and that a range of negative consequences exists. However, carbon dioxide emission rates are increasingly accelerating beyond earlier projections and play an important role in our future. While we understand the rationale of the Department of Environmental Protection (DEP) to promote flexible guidelines and the need for innovation, we support the EPA-proposed standards for both new as well as existing power plants. We cannot afford to allow a state-by-state approach to emissions that knows no boundaries. The League encourages the Department to look for incentives rather than special accommodations to accelerate pollution control so that Pennsylvania not only complies, but also assumes a leadership role in improving air quality and public health.

As a related and significant aspect of this emissions issue, the League requests that you promptly, systematically, and strategically address the loss of methane from natural gas operations and other sources. As you may know, methane is 34 times stronger than carbon dioxide as a heat trapping gas over a 100-year time frame.³ We are hopeful that the natural gas emissions inventory will provide the public and policy makes the data needed to guide decision-making in this critical area. We are indeed grateful that the DEP is looking at data provided by companies engaged in midstream transmission as well as unconventional and coal bed natural gas development. While this is valuable information, we appeal to the Department to provide the ongoing air-quality monitors in known regions of such emissions so that cumulative impacts can

¹ For further details and background information, see the LWV US national position on Natural Resources at <http://www.lwv.org/content/environmental-protection-and-pollution-control>

² <http://www.ipcc.ch>

³ See <http://thinkprogress.org/climate/2013/10/02/2708911/fracking-ipcc-methane/>

be captured. Response units need to be prepared by DEP for immediate deployment to areas of emergency releases such as the blast in Dunkard Township.⁴ Emissions data should also be reported in meaningful ways that provide for specific constituents and values that go beyond averages. Range, medians and even specific time intervals of exposures may be indicative of variables that impact public health. We are optimistic that the DEP will be sensitive to the needs to quantify and qualify air emissions.

As you may know, the League, through its Water Resource Education Network, has long worked for the protection and management of Pennsylvania's water resources, both surface and ground water, through education and informed policy making. We are appreciative of today's report on water quality monitoring assessment and methods. The consistent use of best practices is vital to gathering critical data. However, once reported, violations must prompt vigorous enforcement mechanisms, including sanctions for localities that do not meet standards and substantial fines to promote compliance. We would hope that this report, as well as those related to air emissions, will reassure citizens of the Commonwealth that our Constitutional right to clean air, pure water, and the preservation of our natural resources are being held in the capable hands of the Department that serves as our trustee.⁵

⁴ See <http://stateimpact.npr.org/pennsylvania/2014/04/09/chevron-blocked-access-to-dep-after-fatal-well-fire-in-southwest-pa/> This type of reported response must be avoided.

⁵ Adapted from the *Pennsylvania Constitution, Article I, Section 27*.