



**LEAGUE OF WOMEN VOTERS®
OF PENNSYLVANIA**

226 Forster Street, Harrisburg, PA 17102-3220

717.234.1576

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Public Comment
League of Women Voters of Pennsylvania
To the
Citizens Advisory Council
of the
Department of Environmental Protection
January 21, 2014

Good morning. I am Roberta Winters, speaking for the League of Women Voters of Pennsylvania. As long standing advocates for public participation, we commend the Department for facilitating involvement in the proposed oil and gas regulations. Provisions for two webinars, seven Environmental Quality Board hearings and additional time for written comments are laudable. While we believe there could have been more hearings in areas impacted by such development, we recognize that such rules are long overdue. The League also celebrates the launch of the on-line public comment tool to increase ease and efficiency of citizen input. We are optimistic that many of the concerns expressed by residents throughout the Commonwealth will prompt stringent regulations that protect our right to clean air, pure water, and the preservation of our natural resources.

The League would like to express our appreciation for the opportunity to comment on three items before you this morning. First, we are pleased that the Climate Change Action Plan is now available. However, we believe it is lacking. Consistent with our national position, the League is calling for prompt action to cut greenhouse gas emissions, freeze construction of new coal-fired power plants and invest in a new clean energy economy.¹ Specifically, more emphasis should be placed on energy conservation and development of renewable, sustainable sources. While we recognize that natural gas is a cleaner burning fuel than coal, methane emissions, be they planned or unintended, must be addressed and limited by this agency. According to the 2012 NOAA Study of air sampling over Colorado gas fields, methane is 25 times more efficient than CO₂ in trapping heat.² The on-going development of Marcellus and Utica shale may continue to increase, rather than decrease Pennsylvania's role as a significant contributor to climate change. Thus, we believe climate change in Pennsylvania can best be tackled in concert with a long-term energy policy that focuses on renewable sources rather than predominately fossil fuels.

¹ See <http://www.lwv.org/issues/global-climate-change>

² <http://www.nature.com/news/air-sampling-reveals-high-emissions-from-gas-field-1.9982>

Secondly, we look forward to hearing more about the proposed changes in the general permit (BWEW GP-8). The League appreciates the efforts of Mr. Kunz to bring our attention to this matter at the previous meeting of this Council. Given the depth and breadth of the proposed provisions, the existing title of the permit could benefit from revision. As you may be aware, it includes significant language relative to a myriad of pipelines and potentially exploratory wells without a clear delineation of the impacted area. The League has submitted comments and hopes that you will exert your influence to limit and clarify its purview to safeguard our water.

Third, we look forward to hearing about Strategic Planning for this Council. We ask you to consider prioritizing the long-standing concerns about Long-Wall Mining that continue to put Pennsylvania's water, land, and air at risk. Act 54 must be revised. Many of the consequences predicted have become reality. Now is the time for recommendations to be implemented and translated into practice. An important consideration in your planning should be to avoid passing on the costs of clean up and remediation of industrial development to the Pennsylvania taxpayers. Based on our history of natural resource exploitation by the timber and coal operations, we must not only provide adequate fees and bonding, but also be proactive in legislative initiatives. For example, Senate Bill 411, that would remove liability from those that use acid mine drainage, is not in the public interest and will leave taxpayers paying the bill. Finally, in reading the DEP website, it has also come to our attention that January is radon awareness month. With this in mind, we would encourage DEP to assess periodically the levels of radon in gathering lines that are becoming increasingly prevalent throughout out Commonwealth – both in rural and urban areas. This is consistent with your mission in protecting public health not only for our generation but also for our children and grandchildren.

Thank you for your on-going consideration.