

DRBC TO MEET IN NARROWSBURG

DELAWARE RIVER BASIN COMMISSION

JUNE
5TH

RARE OPPORTUNITY
WANT TO SPEAK? REGISTER:
[TINYURL.COM/REGISTER-TO-COMMENT](https://tinyurl.com/register-to-comment)

JOIN DCS AND THE DELAWARE RIVER FRACK BAN COALITION

LET THE DRBC KNOW YOU CARE ABOUT CLIMATE IMPACTS!

Following the meeting there will be a screening of the short film *Our Shared Waters: A Flight Along the Delaware* and a panel discussion highlighting success stories and management challenges for the Upper Delaware River, moderated by Meg McGuire, Delaware Currents.

9:30 AM PRESS CONFERENCE @NARROWSBURG UNION

10:30 AM MEETING @TUSTEN THEATER

DamascusCitizens.org

PLEASE ATTEND AND BRING OR MAKE SIGNS - we will have sign-making materials in the parking lot at The Narrowsburg Union

COMMENTING POINTS

Usually you are allotted 3 minutes for your spoken comment (written can be any length) - so best to put your 'punch-line' near the beginning.

There is a Climate Resolution https://www.nj.gov/drbc/library/documents/Res_ClimatePlan_draft.pdf up for a vote at this meeting and there is also a Climate Advisory Committee of outside experts which is quite good but very underutilized by the DRBC. The Climate Resolution will probably be passed before the Public Comment time, but pushing for various points below may influence how the resolution and Climate Advisory Committee are implemented.

We urge: Underlines are emphasis added - and **in bold** especially important

- DRBC Resolution 2024 is described as "A RESOLUTION directing staff to develop a Climate Resilience Plan that includes elements related to planning, consultation, outreach, education, and rulemaking concerning climate change." Support these concepts with emphasis on "**rulemaking**" to **require the consideration of the climate impacts of the dockets reviewed by the Commission** and other projects in the Delaware River Basin. The goal of the rulemaking must be to prevent and avoid exacerbating the climate crisis and the negative impacts of climate change in the Watershed.
- DRBC must take into consideration the **needs of FARMERS or we will not have food!** Raising food requires an intact ecology including insect pollinators, a steady climate and without taking climate impacts into account, DRBC will make mistakes that will imperil vital resources.

- We support that the Commission require the consideration of the climate impacts of the applications reviewed by the Commission and we recognize the Commission’s authority to require the prevention of negative impacts from the activities and operations of projects. **We support that the primary purpose of such rulemaking is PREVENTION, not accepting that these impacts are inevitable and the only response is to adapt. We know changes are occurring, we see them everyday but we also know that the are actions that DRBC can take** to help ratchet back greenhouse gas emissions that are driving atmospheric warming and the climate crisis, and actions to address the impacts we are experiencing through strong and effective rules that protect and restore our natural ecosystems and watershed.
- [The Resolution](#) has many good foundational references that explain the rationale for the Resolution. Important to base this plan on science and the most recent findings regarding the climate crisis.
- Without preventive planning the DRBC will find itself unable to keep enough clean water for the out of Basin (NYC) and in Basin **residents’ needs and for FOOD PRODUCTION. In areas of the Delaware Basin, there are many farmers and much food production.**
- Important that the four states’ and federal government’s climate laws, plans and executive orders are cited, showing alignment on the pressing need to reduce greenhouse gasses and tackle climate change through action.
- Environmental/climate impacts can be amplified by us - for example, see our Coalition submission last September: [DRBC Com9.8.2023combined.pdf](#)
- Amplify in the last “Whereas” in the draft resolution **the power of DRBC to establish rules (require climate impact assessment in order to prevent negative impacts that climate changes we are already seeing in the Basin)**. Additionally, support that Commission has the power and duty to review projects that are proposed in the Watershed that may cause harm and worsen climate impacts: “WHEREAS, the Commission is charged with developing and adopting, and with periodically reviewing and revising, a Comprehensive Plan for the optimum planning, development, conservation, utilization, management and control of the water resources of the Basin to meet present and future needs; and the Delaware River Basin Compact (the “Compact”) provides the Commission with a range of tools for developing and implementing its Comprehensive Plan, including powers to conduct and sponsor research; to plan, design and construct projects, activities and services; to establish rules; and to review projects sponsored by other entities that may have a substantial effect on the Basin’s water resources to ensure such undertakings do not substantially impair or conflict with the Comprehensive Plan”. Amplify that DRBC should review projects proposed by applicants that do not necessarily trigger the review threshold for a docket and may be under the purview of other agencies if the activities/

operations will negatively affect the basin –i.e. bad projects that don't necessarily fall under DRBC docket authority.

- DRBC needs to not only plan for “resilience and adaptation” but needs to adopt policies and rules to PREVENT and AVOID climate impacts by requiring that decisions made by DRBC accurately assess the climate impacts of a proposal and take action that is preventive. The Climate Resilience Plan’s “Be It Resolved” “Directive” section says the E.D. is directed to develop “a plan of prioritized DRBC actions for evaluating the impacts of climate change on water resources of the Basin and formulating management approaches, including recommended policies and rules, for improving resilience and adaptation to a changing climate.” The purpose must be to align with the climate action plans and goals set by the states and the federal government and ensure that GHG reduction goals are being reduced by the decisions being made. For instance, President Biden has set a goal of reducing the nation’s greenhouse gas emissions by 50-52% below 2005 levels by 2030. <https://www.whitehouse.gov/climate/> (Can insert individual state GHG reduction goals here also).
- Support that DRBC evaluate the climate impacts of activities that they list under “Be It Resolved” and take action to integrate climate considerations into what is done including the FFMP and the “seasonal and long term hydrologic changes” in flows.
- “Be it Resolved” includes in the list of items to prioritize for climate assessment “Flood Loss: Evaluate the impacts of climate change on the frequency and extent of main stem and tidal flooding. Review and propose updates to DRBC’s Flood Plain Regulations“. Amplify this as essential because flooding and flood damages will only get worse with climate impacts.
- Add that other actions by DRBC should be prioritized also – for instance, dockets for water allocations and wastewater discharges should be considered for denial due to salinity, groundwater depletion, water quality degradation and other climate-linked impacts and dockets that include additional greenhouse gas emissions.
- **Plans and rules are good but without enforcement they are meaningless. Investment needs to be made by DRBC in an enforcement arm to ensure rules and the Comprehensive Plan are followed.**
- Science supports taking this action and DRBC’s Advisory Committee on Climate is a brain trust of scientific and technical knowledge that should be central to the development of this plan and its implementation into actions.

- **NO TIME TO WASTE! The Plan must result in regulations**, this can't just sit on the shelf but needs to be implemented right away as the climate crisis is an emergency. TIME IS UP! Urgent action needed. Reduction of GHGs by 2030 is the target goal of all climate action plans and is agreed to by the global scientific community and is only 6 years away.
- **We advocate that there be a public input process associated with the development of this plan.** The Plan will benefit from public thinking and participation and the public will benefit from learning what the DRBC is planning and how the Climate Advisory Committee is taking part in this development. The planning process should be iterative and be opened to public comment and public hearings at various stages of its development and before final adoption.