

Damascus Citizens for Sustainability

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B Arrindell here from Damascus Citizens for Sustainability, a climate and Frack Ban Coalition member.

It is very important and very good that the draft resolution on the Climate Resilience Plan includes using the Advisory Committee on Climate Change to Consult on the Water Resources Program and the Climate Resilience Plan. This consulting should include all dockets and meetings should be frequent - the idea should be that this plan seek preventive actions not only “resilience and adaptation” or compensating for damages projects will cause - and the Advisory Committee on Climate Change with its very knowledgeable experts should be very helpful in rule-making. Also appropriate changes must be made to incorporate this expert committee’s input on all dockets.

The fact that in Pennsylvania and some places in New York, there is an epidemic of toxic, radioactive waste being dumped on roads in areas where either there is drilling occurring or drillers or other companies feel they can get away with this despicable, actually illegal, poisonous practice means these areas will be lacking in clean water - yes, mostly outside of the Delaware Basin but some may also be in the Delaware basin - who is minding the store? where are the enforcers of laws that are supposed to be protecting the population- both human and otherwise? Elected officials are holding office obligated to “protect the health and welfare” of those in the municipalities they govern, not turn their municipalities into disposal facilities - as on this likely incomplete list from PADEP that I will submit of close to 100 municipalities with 245 named places where dumping of liquid oil and gas drilling waste - I refuse to call it ‘brine” - on roads is happening - and the PADEP actually lists the municipalities themselves as “disposal facilities” in their official waste listings - these places will look soon for clean water - and maybe to the Delaware Basin for it.

AND, very importantly, if the DRBC plans on only using state resources for enforcement, then you are expecting PA DEP to enforce your block on liquid oil gas drilling waste being brought into the DRB from PA and dumped on roads and this is the very agency that has totally caved to the oil gas industry and declared this toxic, radioactive waste as a “beneficial co-product” and the places where people live as “disposal facilities” - then you will be very disappointed in the enforcing of your rules!

DRBC must have its own ability to enforce if there is to be enforcing happening! How to enforce must be part of your rule-making.

Please know that we are fans of DRBC and want to thank DRBC for paying attention to climate in its decisions, we want it to be effective fulfilling its mandate to protect the resources of the Delaware Basin.

Thank you.

## REFERENCES

<http://www.paenvironmentdigest.com/newsletter/default.asp?NewsletterArticleID=54480>

<https://www.senatormuth.com/policy-committee-highlights-public-health-and-environmental-concerns-over-road-spreading-of-oil-and-gas-wastewater/>

[http://cedatareporting.pa.gov/Reportserver/Pages/ReportViewer.aspx?/Public/DEP/OG/SSRS/OGRE\\_Waste\\_Facilities](http://cedatareporting.pa.gov/Reportserver/Pages/ReportViewer.aspx?/Public/DEP/OG/SSRS/OGRE_Waste_Facilities)

and the spreadsheet with municipalities and area names

<https://www.dropbox.com/scl/fi/hdyuarrxjpc07lzlemy/Municipalities-Designated-as-Disposal-Sites-REV2.xlsx?rlkey=a7hxuc6q5seemgi7p6qed7ow7&dl=0>