

B. Arrindell, here, Director of Damascus Citizens for Sustainability which is a member of the Delaware River Frack Ban Climate Action Coalition.

DRBC Commissioners, the Commission formed the Advisory Committee on Climate Change in 2020, but it only met once last year at the very end of the year. Why? There are remarkable talents on that Committee that should be used, they should be evaluating the climate impacts of each docket and asked how to make improvements. If the DRBC adopted rules to require consideration of climate impacts of dockets the Climate Advisory Committee could be helping your reviews. - and Why not? They could help evaluate proposed projects out of expertise not currently being accessed. Questions like: Sometimes centralized is better and sometimes not - in this docket what is the location, what is nearby?— the machinery used - is it efficient? - is there better? - are there ways of tracking leaks? - of correcting leaks? - could there be impacts from intense rain events? - from sea level rise? - and questions I can't think of to ask, but they will with their much greater knowledge. If the Climate Committee is not asked to participate you are wasting their time and good intentions.

In this EPA posting on sustainable-water-infrastructure and water-efficiency for water-suppliers

<https://www.epa.gov/sustainable-water-infrastructure/water-efficiency-water-suppliers>

They look at **Water Loss Control** among other items quote

National studies indicate that, on average, 14 percent of the water treated by water systems is lost to leaks. Some water systems have reported water losses exceeding 60 percent. Accounting for water and minimizing water loss are critical functions for any water utility that wants to be sustainable. unquote

How are water authorities tracking leaks? Are they required to fix them?

In this article, EPA also looks at consumption aspects to reduce use like using consumer rebate and education programs - are water authorities using them?

They look at **Aquifer Storage and Recovery** - including enhancement of natural ground water supplies - the Advisory Committee will have thoughts on all these items and how projects can and should be using these ideas - but if you don't ask...

The DRBC should take immediate action to prioritize minimizing impacts of the climate crisis.

We advocate that you use the Climate Advisory Committee in that effort.

**THE CLIMATE CRISIS IS UPON US. WE ARE RUNNING OUT OF TIME!**

**DCS comments to DRBC June 5 2024-climate in dockets**

Damascus Citizens for Sustainability

Contact Person: Barbara Arrindell Director@DamascusCitizens.org

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>

## DCS comments to DRBC 9-5-2024-flooding

Hi, I'm B. Arrindell, Director of Damascus Citizens for Sustainability, a member organization of the Delaware River Climate and Frack Ban Coalition.

Commissioners, you know that the Delaware River Watershed is already experiencing the effects of climate change and is one of the most impacted regions in the nation due to rapid river level rise, sinking land mass, and the onslaught of storm surges with violent weather patterns. In the absence of adaptation-meaning putting less heat trapping gasses, CO2, methane, etc. in the air, there will be more intense and frequent extreme flooding including from sea level events in the area. Together with trends in coastal and river edge development, expected annual flood damages will increase by 2-3 orders of magnitude by year 2100.<sup>1</sup> This according to the IPCC.

We have already seen extraordinary flooding events here in the Delaware Basin and many more smaller but still damaging flooding events. I will put anotted pictures in our written comments.

We can't absorb more flooding of communities, we can't lose more wetlands, habitats and species and human public health must be protected. Also, farming is made more difficult. We must do our part here in the Delaware River Watershed to curb the climate crisis by preventing greenhouse gas emissions wherever we can and protecting water resources. **DRBC must be part of the solution, not the problem so taking climate impacts into account when evaluating dockets is vital. That's why we strongly urge DRBC to involve the Avisory Committee on Climate Change in both regulatory and docket decisions.**

Also, it's not just rain on land areas causing floods - sea level rise translates into river level rise in the tidal Delaware River. The effects of rising of the seas moves upriver from the ocean, the Bay, the estuary and into tidal reaches of the river, raising the river's level and the level of the river's freshwater tributaries, as well as impacting the salt front.

In the nontidal river and its watershed, extreme weather events cause inland flooding and its cascade of impacts to natural ecosystems, streams, habitats, infrastructure and the human environment, and to the hydrology of waterways and the hydrologic cycle, which is altered by increased stormwater runoff. Also there is wetland disruption and less natural infiltration and impacts to natural floodplain functions - all meaning more flooding.

So again, **DRBC must be part of the flooding solution, not the problem by taking climate impacts into account when evaluating dockets. That's why we strongly urge DRBC to involve the Avisory Committee on Climate Change in both regulatory and docket decisions.** Thank you - end of my spoken comment.

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<sup>1</sup> IPCC (2019). The Ocean and Cryosphere in a Changing Climate. Intergovernmental Panel on Climate Change. Retrieved from [https://report.ipcc.ch/srocc/pdf/SROCC\\_FinalDraft\\_FullReport.pdf](https://report.ipcc.ch/srocc/pdf/SROCC_FinalDraft_FullReport.pdf) at 6-3.

ADDITIONAL on flooding: As mentioned in my comment I am supplying some pictures of Delaware Basin flooding - and some out of the area. The out of the area pictures are included to illustrate what happens when industrial sites like oil gas drilling storage and drilling pads are flooded - similar would be flooding, for example, of some of New Jersey's 112 superfund sites.

These and more are in this folder <https://www.dropbox.com/scl/fo/3kt1y7dw250zzagsvb12e/AKsOEe95E85E0HAs1r7MBtQ?rlkey=yteamoxgzdxddl6q70344w8cs&dl=0>

below find two sets of pictures

2006 Delaware River flood Narrowsburg Milanville Callicoon

and

Susquehanna and Colorado flooded frack pads



## DRBC testimony on June 5, 2024

Hello, my name is Eugene Thalmann.

I am a farmer, a member of the Sullivan County Agricultural and Farmland Protection Board, the president of the Sullivan County Farmers Market Association, and an alternate for the Town of Liberty's Planning Board.

I am here today to remind the Delaware River Basin Commission (DRBC) of the crucial role water plays in food production, the increasing challenges posed by climate change, and the necessity of prioritizing farmers' needs in the decision-making process.

Water is the lifeblood of agriculture. Without it, crops cannot grow, and livestock cannot thrive. As we face dramatic changes in weather patterns due to climate change, maintaining a stable water supply has become even more critical for the success of farming operations. Farmers depend on various water sources, such as rivers, lakes, and wells, all of which are deeply influenced by the surrounding landscape and development activities.

Overdevelopment poses a significant threat to these water sources. The drilling of new wells and the overuse of existing ones can lead to wells running dry, leaving farmers without the water they need. Moreover, urban sprawl and industrial expansion can contaminate water supplies and disrupt natural water cycles, exacerbating the already challenging conditions farmers face.

Understanding the hydrogeology of our area is essential to ensuring that as development continues, agricultural operations can still meet their water needs. We need comprehensive studies and informed planning to protect our water resources from the impacts of overdevelopment. Sustainable water management practices must be implemented to balance the needs of agriculture with those of growing communities and industries.

It is imperative that the DRBC recognizes the critical importance of water for farming and prioritizes the needs of farmers in its policies and decisions. By doing so, we can ensure that agricultural operations remain viable and that our food supply is secure. We must also protect our environment from the adverse effects of unchecked development, preserving the natural ecosystems that support both agriculture and biodiversity.

In conclusion, farmers are essential to our society, and their access to water is vital for food production. The challenges of climate change and overdevelopment demand that we take immediate action to manage our water resources sustainably. By prioritizing farmers' needs and protecting our environment, we can build a resilient agricultural sector and secure a sustainable future for all.

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