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Mr. Balay,

Thank you for the opportunity to comment on the SRBC Comprehensive Plan for 2021-2041(1), outlining a vision for the next 20 years.

We are writing as Pennsylvania residents. Pennsylvania is one of three states in this compact and the one with the most watershed area, and the only one of the three with a resident natural gas-extraction industry.

We have a major concern: The Plan claims *Climate change is a cross-cutting challenge that is addressed in the objectives identified within each priority area*. However, we don't see any proposals to address the root cause of climate change: carbon emissions and the role of the natural gas industry in increasing carbon emissions.

The original 1970 Compact (2) states, *the purposes of this compact are to promote interstate comity; to remove causes of possible controversy*. An important source of controversy is unconventional gas development (fracking). The Commission was formed in 1972, when there was no unconventional gas development. Since that time, New York, one of the three states in the Compact, banned fracking in 2015, after careful study. (3)

The Compact, talks about "Inherent Values." *Inherent Values. The signatory parties agree that it is a purpose of this compact in effectuating the conservation and management of water resources to preserve and promote the economic and other values inherent in this historic and the scenic and other natural amenities of the Susquehanna River Basin for the enjoyment and enrichment of future generations, for the promotion and protection of tourist attractions in the basin, and for the maintenance of the economic health of allied enterprises and occupations so as to effect orderly, balanced, and considered development in the basin.*

The Compact lacks mention of public harm. We now know, what we did not know in 1970, that runaway gas extraction is a major cause of carbon emissions and climate change, and therefore is not an "inherent value" to be preserved.

The draft Comprehensive Plan acknowledges the need to update the plan periodically to address *emerging* issues and challenges. (4) Climate change is more than an emerging issue. It is here and now.

We are in a climate emergency. Clearly, to get to a state of carbon neutrality over the next 20 years, gas production will need to be greatly curtailed. Your Plan must promote that end. All hands on deck! **If you are not part of the solution, you are part of the problem.** All agencies (local, federal, state, interstate), as well as corporations, must engage in introspection as to how their decisions and actions promote the climate apocalypse ---or slow and reverse it.

We disagree with the SRBC's inclusion of "natural gas" among the water resource "needs" it should address over the next two decades (excerpt below). Sure, gas extraction is here presently, and the SRBC will continue to sell water to the gas industry in the short term. However, ensuring an adequate supply of water for natural gas over the next two decades is wholly inconsistent with "ecosystem stewardship" and where we need to be as a region, nation, and world.

*Fulfilling the vision means addressing diverse, complex water resources needs, now and in the future. These needs are interconnected and continually evolving, requiring integrated and adaptive water resources management approaches to ensure water demands are met while balancing public health and safety, economic development, and **ecosystem stewardship**. They include, for example:*

ensuring adequate water supply for electric generation, public water supply, manufacturing, mining, natural gas, agriculture, and recreation;

In 2016 we already knew that climate change was increasingly affecting weather patterns, including droughts and floods. (5) PA will see more droughts in summer and fall due to climate change. Water resources will have to be conserved. Excessive and unnecessary consumptive use, like fracking, is incongruent with this emerging reality.

The overarching *need* is to disincentivize fracking as rapidly as possible. That is your urgent and paramount mission. There is no mystery as to why New York decided to disallow fracking in 2015, after studying it. Pennsylvania has now had a decade of experience, with much environmental harm to show for it. Natural gas is no longer the “bridge fuel” to a clean energy future.

Presently, gas is so plentiful and cheaply extracted in Pennsylvania that the industry has caused pipelines and LNG export terminals to be built to take away the excess U.S. gas (estimated at about 20% of U.S. gas production.) The cheapness of gas spurs infrastructure for exports, causing Pennsylvania to be a major driver of worldwide gas use, disincentivizing adoption of clean energy technologies. Why not make gas more expensive so less is exported and less is fracked? The fracking industry predicts it will increase its gas production by 14% percent in the next year. The increased gas production will go to international exports. (6)

The pie chart on page 12 shows a significant amount of total basin-wide consumptive use going to gas. Alarmingly, the chart for 2040, does not show much of a decrease. **Does the SRBC think we should be fracking in 2040 at the same rate as 2017?** One would rather see the 2040 pie chart show a narrow sliver of gas consumptive use.

By allowing cheap water to the fracking industry, SRBC will be a part of the problem. **Cheap water to the gas extraction industry subsidizes fracking.** We see that you have outlined prices for water permits and consumptive use. (7) SRBC can be part of the solution we need. The SRBC needs to price water to the fracking industry commensurate with the environmental and social harm. The SRBC can help us get to minimal natural gas extraction. SRBC can price water for fracking at a rate that drives up the price of gas relative to renewables. We see you have different prices of permits – why not have tiered pricing for the consumptive use, rather than the flat rate of \$.33?

In summary, we are in a ***climate emergency***. You must be part of the solution.

As responsible stewards, we hope you will look at your mission broadly and responsibly. Be leaders who can break from the past in the face of new information and changing risks. Seriously consider your ability to ameliorate those risks. If this body does not consider its obligation to reduce gas extraction, who will?

Thank you.

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cc.

Basil Seggos, New York Commissioner
Patrick McDonnell, Pennsylvania Commissioner
Ben Grumbles, Maryland Commissioner
Brigadier General Thomas J. Tickner, U.S. Commissioner

References

1. Draft Comprehensive Plan

<https://www.srbc.net/our-work/programs/planning-operations/docs/draft-comprehensive-plan-2021.pdf>

2. Susquehanna River Basin Compact

<https://www.srbc.net/about/about-us/docs/srbc-compact.pdf>

3. The 2015 report of the state of New York

https://www.dec.ny.gov/docs/materials_minerals_pdf/findingstatehvhf62015.pdf

4. Vision. The Commission envisions a clean, sustainable, and adequate water supply in the Susquehanna River Basin that supports a range of human, economic, and ecological needs. Through collaborative partnerships and coordinated action, as well as use of the best science, water resources in the Basin will be managed effectively to meet existing and emerging challenges in the face of changes to the landscape and climate extremes. As a result, Basin communities will be able to reliably depend on their water supply for a range of uses, be better prepared and able to mitigate the impacts from floods and droughts, and benefit from healthy aquatic ecosystems and enhanced recreation

<https://www.srbc.net/our-work/programs/planning-operations/docs/draft-comprehensive-plan-2021.pdf>

5. Rising temperatures and shifting rainfall patterns are likely to increase the intensity of both floods and droughts

<https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-pa.pdf>

6.

Northeast production could climb 4.6 Bcf/d (14%) over the next five years.

<https://rbnenergy.com/headed-for-heartbreak-northeast-gas-markets-slow-march-toward-more-takeaway-constraints>

Pennsylvania's gas output reached approximately one fifth of the total U.S. production.

<https://www.eia.gov/todayinenergy/detail.php?id=35892>

LNG exports support gas prices.

<https://www.offshore-energy.biz/eia-lng-exports-rise-to-boost-henry-hub-prices/>

Low prices accelerate both consumption and exports.

<https://www.reuters.com/article/us-usa-gas-kemp/column-us-gas-market-tightens-despite-mild-winter-kemp-idUSKBN29V1ZP>

U.S. exports of liquefied natural gas (LNG) set a new record in December.

<https://www.eia.gov/naturalgas/weekly/>

7. REGULATORY PROGRAM FEE SCHEDULE. Effective January 1, 2021

<https://www.srbc.net/regulatory/fee-schedules/>

TABLE 1. PROJECT REVIEW AND MODIFICATION FEES

Unconventional Natural Gas or Other Hydrocarbon Development:

New Application \$ 8,075

Renewal Application \$ 2,075

Modification of an Approval \$1,125

TABLE 3. CONSUMPTIVE USE MITIGATION FEE Standard Fee \$0.33 per 1,000 gallons consumed