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BASIN COMMISSION

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NATURAL RESOURCES DEFENSE COUNCIL

January 7, 2011

Carol Collier
Executive Director
Commission Members
Delaware River Basin Commission
P.O. Box 7360 West Trenton, NJ 08628

Re: Natural Gas Development Draft Regulations

Dear Director Collier and Commission Members,

Natural gas development in the Delaware River Basin, and how the Commission regulates such development, will affect the region's many residents and the character of the landscape itself. As the Commission begins rulemaking for its draft natural gas development regulations, we ask that you adjust the timeline and process to allow increased public comment and participation.

Nationwide, and particularly in communities in the Delaware River Basin, natural gas development is a matter of urgent public concern, as demonstrated by countless newspaper editorials and public comments regarding natural gas-related projects in the region. Given the high level of demonstrated public interest and the certainty of the regulations' far-reaching impact, it is critical that the Commission allow interested parties sufficient time and opportunity to review and respond to the proposed regulations.


Furthermore, while Commission-sponsored meetings, public events and workshops are important for community education and input, they are no substitute for official public hearings on the proposed regulations.

We therefore make the following suggestions with respect to the public comment process:

1. Allow for a public comment period of at least six months; a 90-day period is inadequate for full review and comment on the extensive and technical regulations.
2. Conduct a sufficient number of hearings, in geographically diverse and accessible locations, to permit stakeholders to submit verbal testimony. Each Basin state should host at least one hearing, and additional public hearings should also be held in New York City and Philadelphia, the two main population centers that rely on water from the Delaware River. Furthermore, given Pennsylvania's large size and its diffuse population, the state should host at least three public hearings: one in the upper region, one in the central Watershed area and one in the southeastern region.

Thank you for considering the public's need for adequate opportunities to provide input. Please do not hesitate to contact me with any questions or concerns you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Sinding', written over the printed name.

Kate Sinding

Senior Attorney

Natural Resources Defense Council