



Carol Collier, Executive Director
Delaware River Basin Commission
5 State Police Drive
P.O. Box 7360
West Trenton, NJ 08628-0360

7/03/2012

Re: Docket No. D-2011-022-1

Dear Ms. Collier,

Special protection says it all. The Delaware River Basin deserves it. You have the authority to provide it.

The Leagues of Women Voters of Pennsylvania, New Jersey, New York, and Delaware continue to be alarmed by the threat of natural gas development and transmission in our highly valued watershed. We therefore request that the Delaware River Basin Commission (DRBC) not act at this time on the applications presented as part of the Tennessee Gas Pipeline Company's Northeast Upgrade Project. A pause is needed to provide the time to safeguard the valued resource that you are obliged to protect. We encourage you to obtain adequate data to determine the individual and cumulative impact of both proposed water withdrawals and pipeline construction relative to this project. It is essential that the DRBC provide a watershed-based level of analysis and oversight before precedent is set by any decision-making regarding this treasured resource area.

As you may know, based on our national position, the League of Women Voters believes

Natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical, and biological integrity of ecosystems and to protect public health.

As part of our national policy on resource management, we believe:

Resource management decisions must be based on a thorough assessment of population growth and of current and future needs. The inherent characteristics and carrying capacities of each area's natural resources must be considered in the planning process. Policy makers must take into account the ramifications of their decisions.

Further, the League supports comprehensive long-range planning and has adopted a national position based on study and consensus that believes wise decision-making requires:

- *adequate data and a framework within which alternatives may be weighed and intelligent decisions made;*

- *consideration of environmental, public-health, social and economic impacts of proposed plans and actions;*
- *special consideration for the protection of areas of critical environmental concern, natural hazards, historical importance and aesthetic value; and*
- *special attention to maintaining and improving the environmental quality of urban communities.*

The Leagues of Women Voters of the Delaware, New Jersey, New York and Pennsylvania recognize the awesome responsibility you have in protecting our life-sustaining Delaware River Basin. We urge that you review the proposed pipeline project under the DRBC's rules of Practice and Procedure, Article 3, section 2.3.5 that grants DRBC authority to regulate pipeline construction activities "that pass in, on, under, or across ... recreation project areas as designated in the Comprehensive Plan" or "incur significant disturbance of ground cover" affecting water resources within the Delaware River Basin. Given the increasing infrastructure expansion and development in this area, time and funding for data gathering, scientific review, critical thinking, and evaluation of all alternatives are needed to avoid harm and minimize potential risks. Precedent-setting, comprehensive standards must be established that promote an environment beneficial to life.

We appreciate the gravity of the task before you and your consideration of our position as you provide essential, special protection to the Delaware River Basin.

Sincerely,



Carol Jones, President
League of Women Voters of Delaware



Toni Zimmer, President
League of Women Voters of New Jersey



Sally Robinson, President
League of Women Voters of New York



Olivia Thorne, President
League of Women Voters of Pennsylvania