

Betsy

Peterson

PO Box 21

Hope

NJ

7844

hopefilms@mac.com

Dear Commissioners,

Fracking should be banned as it is completely destructive to human health and the natural environment.

Climate changed. We see the evidence of it everywhere. The only hope we have now is to speed the transition to clean, renewable, sustainable energy. If we don't, the impacts will not be limited to our water resources, but will endanger every aspect of our lives and very our survival. The DRBC must not allow any practices that enable more fossil fuel extraction anywhere. Protecting the water resources of the basin with a full fracking ban protects much more.

The DRBC is considering fracking regulations it is not capable of enforcing. The Commission relies on the watershed states' environmental regulators to carry out enforcement of the rules it sets. State regulatory agencies are chronically understaffed and underfunded. It is unreasonable for the DRBC to place on state regulators the burden of enforcement of dangerous practices like fracking waste processing and extraction of water for fracking operations outside of the basin., DRBC's draft regulations do not specifically propose that injection wells that would hold frack wastewater be allowed in the Delaware River Watershed. However, they do propose to allow wastewater from fracking to be brought into the Watershed for storage, treatment and discharge so "storage" could mean long-term storage of wastewater in underground wells within the Basin. This is a practice that threatens public health and the environment. Injection of wastewater does not "treat" waste or remove contaminants, it simply moves the toxic wastewater produced by fracking from one place and time to another. It risks the migration of untreated toxic and radioactive frack wastewater to aquifers and surface water through leaks from the injection well and spills and accidental releases while being handled. Injection wells are causing earthquakes in Ohio and Oklahoma as well as other locations, as documented by USGS and other scientific institutions. Injection wells are not leak-proof and can exposing groundwater and aquifers to contamination from the toxic mix that constitutes untreated frack wastewater when seals are broken and fractures occur as a result of seismic activity., When a site is developed for gas well development, the change is dramatic, essentially transforming the land to an industrial landscape. The result is destruction of acres of vegetation (8.8 acres per well pad in 2011 with 30 acres of forest impacts

due to edge effects, more than double that is the trend today), soil compaction and destruction of the natural land contours, alterations to watershed drainage patterns, and hydrologically connected systems such as wetlands and vernal pools. Habitats and complex ecosystems are disrupted or lost. 85% of the Upper Delaware where the Marcellus Shale is located is forested. Forest destruction and fragmentation in turn destroys the ability of the forest ecosystem to capture, clean, and infiltrate precipitation, removes the trees that sequester carbon, reduces biodiversity, encourages invasive species, and destroys vital habitat., Changes to stream water quality occur where gas drilling and related activities are located. For instance, a publication of the Proceedings of the National Academy of Sciences found streams adjacent to gas wells are negatively impacted by runoff and sedimentation (Total Suspended Solids), harming benthic life, fish and wildlife and causing streams to be eroded and destabilized. DRBC follows the state's stormwater rules where a project is located, leaving loopholes in current nonpoint source laws that allow fracking activities to escape strict oversight. This would be a recipe for disaster if fracking were to occur, which is why it must be banned in the Delaware River Watershed.

On March 13, leading scientists and physicians released the Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking, 5th Edition documenting fracking's harm to public health. Please read all of the study's findings. Their conclusion, and mine, is that the only way to truly protect public health is to prohibit fracking and all its associated activities (waste hauling, treatment, disposal). I urge you to ban all of these activities in your final regulations.

Sincerely

Betsy Peterson