

To: Edward Hanlon/DC/USEPA/US@EPA
Date: 03/02/2011 04:51 PM
Subject: Re: EPA Hydraulic Fracturing Study Plan

Derar Mr. Hanlon:

Thank You for your response. I had not intended these comments to be reviewed at the March 7-8, 2011 meetin of the EPA SAB because as I stated I had not time to sufficiently study the document and thus was not sure they were adequate.

However, I would be very glad to have you post them on the meeting website if you deem it appropriate.

Thank You

Jeanne Fudala

To: Edward Hanlon/DC/USEPA/US@EPA
Date: 02/28/2011 03:54 PM
Subject: EPA Hydraulic Fracturing Study Plan

Dear Mr. Hanlon:

I did not have sufficient time to review the document "EPA Hydraulic Fracturing Study Plan" so I will not be submitting comments for review by the Scientific Advisory Board for their meeting on March 7 and 8. However, I would like to make some general points.

First, process points:

The draft study plan was not released to the public until February 9, 2011 and most interested parties would not have known of it for at least several more days. That left less than three weeks for public comment. In light of the release date of that study, perhaps the SAB meeting should have been delayed to allow stakeholders at least an additional two weeks to comment.

The deadline for public comments and instructions for how to comment should have been put in bold letters right on the page where one first links to the study; one should not have to link to a separate PDF document for this information.

General Substantive comments:

Any study of the impacts on fresh water by hydraulic fracturing should take into account the fact that the global supply of water that is both fresh and safe is rapidly dwindling even while the population is growing. Therefore we cannot run the risk of contaminating yet more of it. Climate change is exacerbating these stresses through sea level rise and more frequent and intense floods and droughts.

Future studies of hydraulic fracturing should address such matters as impact on air quality, agriculture and food safety compromises, noise and visual pollution and contributions to climate change by hydraulic fracturing and natural gas in general, which are far more significant than once believed. This includes carbon dioxide generated by the massive operations involved in such drilling and the significant releases of fugitive methane. Links to information on the climate change issue are below:

Dr. Robert Howarth

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[http://www.eeb.cornell.edu/howarth/GHG%20update%20for%20web%20--%20Jan%202011%20\(2\).pdf](http://www.eeb.cornell.edu/howarth/GHG%20update%20for%20web%20--%20Jan%202011%20(2).pdf)

Letter to President Obama and senior administration officials, May 4, 2010, from the Council of Scientific Society Presidents.

<http://www.eeb.cornell.edu/howarth/CCSP%20letter%20on%20energy%20&%20environment.pdf>

And the EPA's own report:

EPA (2010). Greenhouse Gas Emissions Reporting from the Petroleum and Natural Gas Industry.

Background Technical Support Document.

http://www.epa.gov/climatechange/emissions/downloads10/Subpart-W_TSD.pdf

Thank You

Jeanne F. Fudala, Private Citizen

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