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Att. Draft HVHF Regulations Comments  
NYS Department of Environmental Conservation  
625 Broadway  
Albany, NY 12223-6510

RE: Regulations regarding hydrofracking in New York State

There are many reasons to oppose hydrofracking in New York State and place a ban on drilling. These comments are a general response to the regulations the DEC has produced. They can be divided into several categories:

1. Environmental. The potential negative environmental impacts have been widely documented across the country. Of course the energy companies claim that won't happen here, but they had said that before. In New York State we have the very dramatic and expensive examples of careless industrial pollution: the Love Canal and the toxins in the Hudson River. A reminder of these two episodes makes one suspicious of the confident claims of drilling companies.

Question: have all the environmental impacts of hydrofracking been satisfactorily answered? The focus has been at the drill-head. What about the pollution and road destruction of trucks moving back and forth across the landscape bringing water to and taking toxins away from drilling rigs?

Question: can the DEC assure New York residents "beyond a reasonable doubt" that it knows about and can deal with the chemical mixtures used in hydrofracking, both in the injection and waste disposal processes? The problem is this decision could well be irreversible.

2. Enforcement. It is widely known that nationwide there is a deregulatory atmosphere in the guise of being business-friendly. From the Federal Food and Drug Administration to the Environment Protection Agency too few resources chasing too many infractions has led to too many dangers in our environment. What guarantees do we have that the state can provide an adequate regulatory environment? A recent study in Canada finds pollution in lakes in large part due to the tar sands oil development. Belatedly the Canadian government has decided it cannot leave environmental assessments to industry
3. Alternative energy. We know fossil fuels, however abundant they may seem, will one day be exhausted. The apparent path of least resistance is to allow hydrofracking with its promise of abundant and cheap fuel. If we continue this path of least resistance we will further delay our development of alternative renewable energy sources. Expediency must be trumped by a long-range vision. "Where there is no vision, the people perish." (Ecclesiastes)

4. Economics. Hydrofracking promises an economic windfall for New York State. However, there is little or no information on what hydrofracking infrastructure will do to the burgeoning wine industry or to agriculture in areas where the two will co-exist. Has the DEC explored this relationship?  
It strikes me as interesting that, for example, the strategic plan of the Finger Lakes economic development group, which will receive nearly \$100 million from the state, does not include hydrofracking in its application. In fact, as far as I can tell, hydrofracking plays no role in any of the economic development plans. One wonders why.
5. Health. It seems disingenuous to engage health experts, give them a short deadline, while already sending out regulations. Furthermore, we have seen little of health impact studies except for a year-old study that a DEC spokesperson says is already anachronistic. The process leaves much to be desired in terms of democratic participation.
6. Religion. As people of faith we must take the long-range view of being stewards of the earth. Potential short term profits cannot dissuade us from taking a multi-generational view of our responsibility for the good earth we in New York State have inherited. A religious perspective critiques a narrow economic view that regards profits as gods. Religion looks at the community as a whole, not as a group of merely economic actors. As we look at other regions of the nation which have invested heavily in hydrofracking, we are dismayed at the rupture of community – the increase in crime and pollution, the eviction of renters who can no longer afford the escalating rates, the divisiveness caused when hydrofracking sets neighbor against neighbor. The overall well-being of our communities must be paramount in our ethical assessment of hydrofracking.

For all these reasons I oppose hydrofracking and call for a ban on its practice in New York State.

I also include a statement made to the Monroe County Legislature on October 9, 2012

Statement on Hydrofracking in Monroe County, October 9, 2012

Richard S. Gilbert - President, Interfaith Impact of New York State

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I'm Rev. Richard Gilbert, President of Interfaith Impact of New York State, a coalition of Protestants, Reform Jews and Unitarian Universalists working for the common good through progressive religious advocacy.

Some of us are old enough to remember the prophetic words of song writer Tom Lehrer: "Just two things of which you must beware: don't drink the water and don't breathe the air." What human beings do to the earth comes back to haunt them.

Two biblical images come to mind. In Genesis (King James version) we read, "Be fruitful, and multiply, and replenish the earth...." We are to replenish the earth – to be good stewards. The earth is not a mine we will one day exhaust, but a garden which continually replenishes itself – with a little help from responsible gardeners. Hydrofracking treats the earth as a mine; we need instead to replenish the earth by harnessing the natural powers of the bio-mass, wind and sun – the energy sources of the future.

When I think of the political struggle over hydrofracking, another biblical image comes to mind: David and Goliath. We are thousands of Davids, ordinary concerned citizens rendered incidental by the Goliath of the energy industry which pours millions into PR campaigns to allow drilling in New York State. Small communities which reject hydrofracking are sued by energy companies – Dryden, for example. We cannot allow a single powerful industry to determine how we live.

We need to go beyond the bottom line. While the temptations to drill are great because of short-term financial gain, a way of life in an environmentally sensitive area is the greater good. We are fortunate to live where we enjoy the greatest resource of fresh water in the world. We need to take the long view. Any decision to drill is irreversible.

I hope and pray Tom Lehrer is wrong, and that we will be able to enjoy breathing the air and drinking the water of our beloved County for a long time to come. I urge the Legislature to ban fracking in Monroe County. Thank you.

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*Interfaith Impact: Working for the Common Good through Progressive Religious Advocacy.*