

From: "Brian Blair"

To: "blm es comments" <blm_es_comments@blm.gov>

Sent: Friday, April 29, 2016 3:47:41 AM

Subject: Comments on Draft Environmental Assessment for Oil and Gas Leasing on Wayne National Forest

Re: Bureau of Land Management Seeks Comment on Draft Environmental Assessment for Oil and Gas Leasing on Wayne National Forest

DOI-BLM-Eastern States-0030-2016-0002-EA.

The following are comments provided per public notice for the Draft EA for the Wayne National Forest, including the Athens District, and Ironton District :

A full Environmental Impact Statement (EIS), per the National Environmental Policy Act (NEPA) is required for this proposed action regarding leasing for oil and gas in the Wayne. The proposed EA does not meet NEPA requirements for the following reasons:

The previously-completed Forest Management Plan and other assessments mentioned by BLM have not considered environmental impacts related to the very recent (past few years) and drastic decline in numerous several bat species in the region, including the tri-colored bat (*Perimyotis subflavus*). These declines are due to a variety of causes, including white-nose syndrome, but may be exacerbated by the impacts of oil and gas development and related disturbances. The proposed action of granting leases must fully evaluate per an EIS the contribution to such declines of bat species, and any possible mitigation measures.

The previously-completed Forest Management Plan and other assessments mentioned by BLM have also not fully evaluated the significant impacts from leasing-based disturbances to hibernacula and related habitat for the Ohio-endangered timber rattler (*Crotalus horridus*) and other reptiles and amphibians in the area. The referenced documents do not fully take into account the larger impact from drill pads, roads and services needed for the newer-type horizontal wells, as compared to conventional vertical wells which pose lesser impacts on each individual site. The proposed action of granting leases must be fully evaluated per an EIS the contribution to such impacts, and any possible mitigation measures, using relevant and updated data.

The previously-completed Forest Management Plan and other assessments mentioned by BLM in the EA do not fully evaluate the significant impacts of the proposed action on the introduction and dispersal of invasive species (both flora and fauna) to the surrounding forest areas. Invasive species, including Hemlock Woolly Adelgid, Emerald Ash Borer, Asian Longhorn Beetle, Ailanthis, Garlic Mustard, Autumn Olive, and other invasives will be introduced from other areas

and dispersed by drilling-related equipment. The impacts from invasives is more wide-spread than previously determined, and/or previous assessments have not evaluated impacts from more recently-introduced species to the area. The proposed action of granting leases must be fully evaluated per an EIS including the incremental impact from introduction and dispersal of invasives, and any possible mitigation measures.

The incremental contribution to greenhouse gas emissions from the proposed leasing action, including the incorporation of recent data from oil and gas development and production including the leases noted, has not been evaluated. An evaluation of such impacts, including potential mitigation measures for such impacts, must be evaluated as part of a full EIS.

Finally, the impacts to both the surrounding forest resources and the area communities (residents) due to the expansion of infrastructure (roads and facilities) and the impacts of larger equipment needed for development of horizontal shale wells has not been fully evaluated in previous documents. In recent years, such impacts to communities and infrastructure have been shown to be significant in other shale-development areas where small communities have been overwhelmed by the needs from larger-scale shale development (compared to conventional oil and gas development). An EIS is required to evaluate such significant human impacts.

Due to the above and other reasons that may be provided in others comments, an EIS is required, rather than an EA.

Sincerely, Brian J. Blair