

May 25, 2016

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

Dear Mr. Wadzinski, Forest Supervisor Scardina and Regional Forester Atkinson

I am requesting an extension of the public comment period for at least 60 more days beyond May 29 2016. It took the BLM 3 months to prepare the Environmental Assessment and because it is long and of significant importance to our region it will take the average citizen at least 3 months to review it, critique it and respond accordingly.

I cannot get through the entire EA but from what I have reviewed so far, it is clear to me the BLM has a predetermined outcome and is manipulating the NEPA process by repeating the conclusions in the 2006 Wayne Forest Plan.

I started my review of the EA by looking at the references. I noted a peer-reviewed study by Michelle Bamberger and Robert Oswald). Impacts of gas drilling on human and animal health. In *New Solutions*, Vol. 22(1), 51-77. doi: <http://dx.doi.org/10.2190/NS.22.1.e> The author of this section uses this study to state that most of the “fluid” during fracking operations stays in the ground. What is concerning is what comes OUT of the ground and what happens to the toxic chemicals that do stay in ...are they monitored?

“In hydraulic fracturing, chemical substances other than water make up a small percentage of the fluid composition; however, the very large volumes used require correspondingly large volumes of a variety of compounds. These substances range from the relatively benign to the highly toxic at certain concentrations. In addition to these added chemicals, naturally occurring toxicants such as heavy metals, volatile organics, and radioactive compounds are mobilized during extraction and return to the surface with the produced water. Of the millions of gallons of water used to hydraulically fracture a well one time, less than 30% to more than 70% may remain underground (Bamberger and Oswald, 2012).”

The use of this study in the EA is absurd! It appears the study is used to assume the insignificance of the volumes of fluids in fracking operations. The study is **about** a look at health impacts .”Communities living near hydrocarbon gas drilling operations have become de facto laboratories for the study of environmental toxicology. The close proximity of these operations to small communities has created a variety of potential hazards to humans, companion animals, livestock and wildlife. These hazards have become amplified over the last 20 years, due in part to the large-scale development of shale gas drilling (horizontal drilling with high-volume hydraulic fracturing), encouraged by the support of increased drilling and exploration by U.S. government agencies . Yet this large-scale industrialization of populated areas is moving forward without benefit of carefully controlled studies of its impact on public health”

I reviewed one more section and then had to stop reading as the document is so confusing and misrepresents issues facing the industry and concerned citizens of today. I looked at the section on socioeconomic impacts. The EA uses a citation from the 2006 Plan:

4.13.2.10. Cumulative Effects on Socioeconomics

The economic conditions of southeastern Ohio have been changing over the past years and decades as a result of many factors and decisions. As described above, timber production was once a much larger generator of wages and downstream economic activity than it is at present. Mineral production, including coal, limestone, dolomite, sand, and gravel, decreased in economic value of production as well as in employment between 1970 and 2000. More recently, oil and gas production in the region has caused an increase in wages, employment, and downstream economic activity.

The primary action that affects the economic conditions of southeastern Ohio is the ownership of the Wayne National Forest. The Forest Service's Social and Economic Assessment (Arbogast, 2004) states that federal ownership of lands comprising the WNF is beneficial to local, rural economies for several reasons. First, the federal government supports the counties through various types of payments and cost-share programs. Second, the federal government maintains the roads and other infrastructure on NFS lands. Finally, the presence of the National Forest stimulates local economies as visitors to the national forest contribute money that they spend for outdoor gear, lodging, food, and other expenses."

However, the author of another reference to socioeconomic impacts cites a work force study (Lendel, Thomas, Murphy & KayInchuk, 2015) that makes NO CLAIMS for any positive economic impacts of fracking, and therefore cannot be used to suggest lack of negative impacts on the region from Wayne leasing, especially since there are huge socioeconomic impacts you have apparently not even considered! "If we assume a linear year-to-year increase through 2019 and that drilling on the Marietta Unit follows the same pattern, then the number of wells drilled per year on the Marietta Unit is about 3.5% of the statewide development. This percentage of the projected number of jobs is about 320 jobs. Only a small proportion of these jobs would go toward reducing unemployment in the five counties for the reasons discussed above, notably the abundant use of transient workers and the lack of technical qualifications among the workforce in southeastern Ohio and northwestern West Virginia. "

If the rest of the Environmental Assessment is as internally inconsistent as what I cite above, the document lacks all authority and validity. The Bureau of Land Management is avoiding the evidence that directs them to an EIS.

It is unacceptable to use information written 10 to 12 or more years ago that finds no significant impact from oil and gas exploration and apply that to today's methods of extraction. There is no question that an EIS is the appropriate tool and review process for assessing leasing of mineral parcels with the expectation that fracking will happen.

This EA underplays and misrepresents the current technology and health studies that are revealing conclusive evidence that fracking is a global issue with global impacts.

The BLM is required to let the public read the Environmental Assessment and comment on it in its entirety. It is impossible to do so in the time you have so far granted and therefore there can be no further consideration for leasing by the BLM until the public feels it has had enough time to evaluate the EA. This is not a test of how well and how fast we read but is about a statutory process that has not been followed and must be under federal law. The BLM also

must have a public hearing because The National Environmental Policy Act of 1969, as amended, requires federal agencies to analyze their actions in a decision-making process that is open to public review and where responsible officials take a hard look at and disclose the potential environmental effects of their actions. Your FONSI reveals that there are NO environmental impacts by fracking. To reach such a preposterous conclusion, you obviously have not done adequate up to date scientific research which would disclose to the public the enormous extensive known certain and likely risks of fracking to the forest, to the environment, to public health, and to the economy of the region. DO YOUR HOMEWORK! DO THE RESEARCH!

We, the citizens must have the opportunity to state for the record our immediate and future concerns of this EA draft. It will be in the best interest of all parties involved in this proposed action for the BLM to use every tool, every opportunity to involve the public to the greatest extent, for however long it takes to comment meaningfully as federal law requires. You have the discretionary power to do this and it would be an abuse of that power to not follow that course.

Respectfully,

Roxanne Groff
Bern Township Trustee
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