

January 22, 2016

Kurt Wadzinski Planning and Environmental Coordinator  
BLM –Eastern States/Northeastern States District Office  
626 E. Wisconsin Ave.Suite 200  
Milwaukee, WI 53202  
[kwadzins@blm.gov](mailto:kwadzins@blm.gov)

Tony Scardina, National Forest Supervisor  
Wayne National Forest  
13700 U.S. Highway 33  
Nelsonville, OH 45764  
[ascardina@fs.fed.us](mailto:ascardina@fs.fed.us)

Kathleen Atkinson, Eastern Region Supervisor  
USDA Forest Service  
500 Hanson Lake Road  
Rhineland, WI 54501  
[katkinson@fs.fed.us](mailto:katkinson@fs.fed.us)

Re: DOI-BLM-Eastern States-0030-2016-0002-EA

Dear Officials Wadzinski, Scardina and Atkinson,

I submit the following comments for the record to object to the sale of any minerals from any unit within the Wayne National Forest. This is the second time within 5 years that a sale of minerals has been reviewed by the Bureau of Land Management and the National Forest Service. This process has been an exercise in obfuscation by the federal officials charged with the management of our Forest Lands. If it were not for the extensive research provided by citizens rather than the government, the public would have little knowledge of the process that is taking place in preparation for the sale of more federal minerals.

The Wayne National Forest Plan was adopted in 2006. Many of the studies were completed years prior to the plan's adoption. So, the Plan the Forest Service is using is over 10 years old. The forest supervisor in 2011 and the current supervisor state the "there is no money to update the Wayne National Forest Plan and there may not be money available for several years." In 2012, a RONI was initiated by Supervisor Carey trying to appease the outcry from the public that there should be NO Consent to the action of selling more federal minerals for the Wayne. This was of course the least cost to the Forest Service as it was NOT a NEPA based document, therefore there is no science based research or PUBLIC INPUT that would shape the report.

The SIR, just short of 100 pages, concludes there are NO needed changes in the 2006 plan. Not ONE change. That is absurd and irresponsible to evaluate a plan over 10 years old and not find ONE aspect of the plan that needs updated. Where is the evaluation on air quality, socioeconomic impacts, water quality contamination research? The USEPA report on impacts of fracking operations after its release last year is being questioned by its panel of scientists as not being comprehensive. Hundreds of articles

on scientific and medical research are being published identifying health effects on the people living near fracking operations. The Forest Service is willing to rely on Ohio law which has been identified by many citizens and public officials in Ohio as being woefully inadequate in its ability to regulate the oil and gas industry in Ohio. The health of thousands of citizens are already in jeopardy and the forest service may willingly contribute to this travesty. This is not an alarmist reaction, this is reality!

What about your Climate Change Scorecard? Does this exercise undertaken by the Wayne demonstrate that Ohio's only National Forest has performed an in depth look at climate change and Ohio's contribution to increasing the nation's pollution and degradation of air quality? All of the fracking operations in Ohio are in the Appalachian region. There is not a single reference to VOC emissions in the SIR for the operation of horizontal drilling in the Wayne because a study has not been performed by the OEPA on whom you will rely for air quality control. This is according to the SIR for your guidance on air quality.

Climate Change in this country and the world is the one of the most urgent crises that over 180 countries have identified during the Paris Climate talks. The President of the United States stated in his State of the Union address:

*" That the world had moved beyond the debate over climate change, despite a large caucus of skeptics in Congress.*

*"Look, if anybody still wants to dispute the science around climate change, have at it," he said. "You'll be pretty lonely, because you'll be debating our military, most of America's business leaders, the majority of the American people, almost the entire scientific community, and 200 nations around the world who agree it's a problem and intend to solve it."*

There is some underlying compelling reason for the Forest Supervisor and possibly the Regional Forester to be considering sacrificing any portion of any unit on Wayne National Forest land. Perhaps it is political pressure from a couple of congressmen in the Wayne's district. Perhaps it is the Oil and Gas industry representatives whose presence at the Marietta BLM/FS meeting was more noticeable than the public's attendance. Representatives for the O&G industry have held public meetings over the past few weeks to inform landowners about drilling in the Wayne. I listened to recordings of these meetings and learned that landowners are being encouraged to support drilling in the Wayne to counter the "radicals" who oppose it. Jackie Stewart from EID made the statement in a meeting in January that "the vast majority of companies have no intention of putting a well on the surface of the Wayne, they want access to the minerals underneath ". That would be a lie.

Regardless of *where* the well pad would be located the fact that a sale of minerals anywhere in the Wayne National Forest will allow drilling in a State that has inadequate laws to protect our air and water resources. You have received scores of letters, many with quotes from research and references to federal laws. DO YOUR HOMEWORK!

When the BLM requests an authorization decision, the Forest Supervisor has authority and discretion under 36 CFR 228.102(e)(1) to reconsider the 2006 "administratively available for leasing" decision

based on new information and/or inadequate NEPA analysis previously conducted for the 10 year plan. The Regional Forester then under c(4)(d) "shall promptly notify the Bureau of Land Management as to the area or Forestwide leasing decisions that have been made, that is, identify lands which have been found administratively available for leasing."

There can be NO parcels administratively available under the federal law until either a NEPA based EIS or SEIS or new Plan is undertaken. The only appropriate decision by a forest supervisor is one that agrees with the President of the United States and thousands of citizens across the nation crying to keep fossil fuels in the ground. What in the hell would make a Forest Supervisor proceed with approving a sale of any more minerals?

There is NO mandate to provide any minerals for any sale simply because there is an interest in the purchase. Especially when the laws have not been followed by which to make that decision! There will always be an interest in the purchase of these minerals. Any oil and gas company would love to have these leases in their portfolio. They then can use the leases to guarantee to private landowners the opportunity to have their minerals leased and the lottery game of fracking can give them hope to become rich.

Supervisor Scardina, Is this what you want to happen in our forest?



These are photos of explosions at fracking and waste holding sites. The highly Volatile Organic Compounds ( never mentioned in the Forest Plan) exposed to an ignition from an electrical spark can cause these horrific and devastating explosions.....anywhere!



This?



This? Grady Oklahoma January 14 2016

Upon your shoulders and your shoulders alone, not the previous forester whom you succeeded, not your employees or the RONI they helped prepare, not the Regional Forester, not the Secretary of Agriculture, not the BLM, not the Secretary of the Interior, NOT a congressman who has only oil and gas interests as a platform, not USEPA, not ODNR, not OEPA, rests the responsibility for the safety of the water for 70,000 citizens in and around our counties. You will be the supporter and contributor to Climate Change if you give in to the Oil and Gas Industry! I pray this is a decision that is never far from your conscious mind, even when you sleep.

Sincerely encouraging a decision of NO Consent,

Roxanne Groff  
Bern Township Trustee  
Amesville Ohio