

Talking points re Wayne National Forest (WNF)/Bureau of Land Management (BLM) proposal to lease land for fracking. Formal comments on its plans for the Marietta Unit due 1-22-16. Include *RE: DOI-BLM-Eastern States-0030-2016-0002-EA* with your comments. Note: Comments will be uploaded for public viewing. Send to blm_es_comments@blm.gov, **cc:** Tony Scardina, ascardina@fs.fed.us, National Forest Supervisor, Wayne NF, 13700 US Highway 33, Nelsonville, OH 45764 and Kathleen Atkinson US Forest Service (FS) Eastern Region 9 Supervisor katkinson@fs.fed.us

Key message: The Bureau of Land Management (BLM) and U.S. Forest Service have no business considering fracking the Wayne until the Wayne evaluates impacts of fracking at the forest-wide level. Doing this research will make it abundantly clear that fracking will have significant negative impacts on our community's air, water, and local economies as well as on the climate and must be rejected for these reasons. *Site-by-site assessments, as the BLM and Wayne are doing, cannot evaluate these cumulative impacts, which under the National Environmental Policy Act (NEPA) must be evaluated in a Forest-wide Environmental Impact Statement (EIS) due to their significance, scale, and intensity.*

The Marietta Unit must not be a sacrifice zone! Please object to the Wayne illegally opening up our National Forest to fracking and its vast consumption of water and production of toxic, radioactive waste and significant air pollution, industrialization of our region, and significant and unnecessary exacerbation of climate change.

In order for the BLM to consider leasing any mineral rights under our National Forest, federal law requires that the Forest Service (FS) first consent. **We demand that the FS withhold consent** because the FS can take action on proposals with significant potential impacts (on the Forest and human community surrounding the Forest) *only* if the action is in accord with the Forest's Plan. Fracking was not evaluated in the most recent Wayne Forest Plan, done in 2006.

The Wayne's inadequate 2012 Supplemental Information Report (SIR), undertaken after community opposition got the 2011 lease sale canceled, is not a NEPA-based evaluation and cannot substitute for one. The FS must undertake a full NEPA-based forest-wide review of the impacts of fracking on our forest, our *community, its economy, and the climate* before considering consent. This review must consider all the new information from peer-reviewed studies, the EPA fracking study (not the misleading statements about its conclusions), NY's evaluation that led to its statewide ban, and incident reports of explosions, fires, and toxic, radioactive releases that have occurred at frack sites and frackwaste operations in Ohio and elsewhere, contaminating air and water and threatening drinking water supplies. (Note especially the weeklong fire of chemicals and waste at a Monroe County frackpad and the Kleese injection well release that killed an entire pond in Vienna Ohio.) Other key points:

- Climate change is a crisis with no equal, demanding immediate and decisive action. Recent studies reveal that frack wells leak vast amounts of methane, a greenhouse gas (ghg) 87 times more powerful than CO₂. This and the lifecycle CO₂ emissions (from trucks, equipment, and burning the fuel) make fracking worse for the climate than coal. And the Wayne proposal comes at a time when 180 countries, including the U.S., have just committed to reducing ghg emissions. The FS has climate change directives calling for each Forest to address mitigation. We support legislation recently introduced into the U.S. Congress that would ban the development of all publicly owned fossil fuels, such as those underneath Wayne National Forest. #keepitintheground

- Fracking chemicals and frackwaste have already caused high levels of air pollution, pollute water, and kill wildlife and vegetation in Ohio (and nationwide, documented in peer-reviewed studies).
- Water contamination and methane air pollution are worse where old, abandoned gas wells create a pathway to the surface. There are thousands of such wells in southern and SE Ohio, many whose locations are unknown. The U.S. Office of the Inspector General issued a report (Dec. 2015) highlighting the serious lack of oversight of these wells on the Wayne in particular.
- Each frack well would require large clearcuts, road building, large machinery, and 1800 truck trips or more. The increased air pollution, noise, dust, and traffic will disturb wildlife, damage recreation potential and infrastructure, create safety hazards, and greatly increase ghg emissions.
- Fracking requires enormous amounts of water, potentially leading to significant depletion of local sources. The Wayne has claimed (in the 2012 SIR) that it doesn't need to evaluate water depletions if they don't come from the Forest. This is contrary to NEPA requirements that all significant potential impacts on the human environment and community around the Wayne must be evaluated.
- Water used in fracking becomes so contaminated and radioactive that it is no longer fit for human or wildlife use, ever. The process of collecting, transporting and injecting this toxic, radioactive waste has contaminated surface and groundwater as well as Ohio's air. These risks are too high and not appropriate for our public forest to bear and impose on the surrounding community, which is already receiving vast quantities of this waste, with air emissions from waste storage tanks polluting neighborhoods in Athens and Washington Counties, which would receive even more waste if the Wayne is fracked.
- Frack waste is often collected in pools, which create a wildlife hazard, particularly to migrating birds. Even if temporary, their radioactivity and toxicity are significant threats to air, water, and forest ecosystems. If stored in tanks, explosion and fire risks are significant.
- Although private landowners who own mineral rights near the Wayne may claim that their rights are infringed by the Wayne not leasing, this is false. No one has a right to require the public to give up *their* rights to a National Forest. The Wayne National Forest was not established to subsidize private landowners and mineral rights speculators at taxpayer expense and at the expense of a healthy forest and community. National Forests are charged by Congress to provide public benefit. The costs of fracking (imposed on taxpayers, the forest, the climate, and the local community) far outweigh any possible benefits, which accrue largely to the industry and to the few workers employed by the industry (who also bear health costs not paid for by industry).
- Speaking of jobs: solar and wind employ up to 12 times the number of people per unit of energy produced than fossil fuels and have significantly lower environmental and health costs. Clean energy can power our nation (see Mark Jacobson national and state-specific studies). Continued extraction of fossil fuels on public lands will devastate climate. There is no good reason to do it and a planet's worth of reasons to stop this give-away to industry. #keepitintheground

The Wayne ***can and must*** say NO to the BLM moving forward with any leasing evaluations until a **Forest-wide EIS** is done. Mr. Scardina ***can and must*** authorize this EIS. He is in charge of the Wayne and responsible to our community to do his due diligence. *No Wayne District is okay to frack. No compromise, no sacrifice zones, no Consent!*

Visit acfan.org and its Wayne and Air, Water, and Health pages for more information.
Athens County Fracking Action Network, January 2016