

COMMENTS TO BLM ON LEASING WAYNE

The BLM should not lease additional acreage of the Wayne National Forest to be fracked due to the known harms caused by the industry, resulting in water loss and pollution of remaining water, as well as forest fragmentation and threats to endangered species such as the Eastern Hellbender. Prior comments opposing the fracking of the Wayne with the justification for better protections for the fragile ecosystem are attached for another review. No further leasing for fracking should be allowed until a full water balance study is done in the region. Already, reports show that there is a collision course between farmers and industry over projected water demands in the future: <https://signalohio.org/dramatic-surge-in-water-demand-predicted-by-2040-puts-farmers-and-industry-on-collision-course-and-the-supply-for-all-in-question/>. This news article does not mention the impacts of water destruction caused by fracking, which are well documented: <https://www.fracktracker.org/2018/02/freshwater-supply-demand-eastern-ohio/#:~:text=The%20hydraulic%20fracturing%20industry%20in%20Ohio%20uses,waste%20that%20cannot%20be%20reintroduced%20into%20waterways.> <https://psr.org/resources/fracking-compendium-9/> The attached peer reviewed study points out that flow alterations are already documented, stating: Excessive flow reductions can occur due to UOG development, Headwater catchments disproportionately impacted, and Legislative incentives and economic incentives may mitigate risk (no further leasing for fracking should be done until protective regulations are put into place). The attached report, Our Water is Being Destroyed, is also entered into the record for review and consideration about deficiencies in legislation before leasing the Wayne. In addition, there are inadequate bonding and insurance requirements of the industry which are needed to ensure that all LLC's that make enormous profits from mineral extraction pay for the wells to be adequately plugged and all land is remediated so that costs for well plugging (which could be in excess of \$250K) are not externalized upon taxpayers: https://environmentamerica.org/wp-content/uploads/2013/07/Who-Pays-the-Cost-of-Fracking_vUS-screen_0.pdf As you know, frack waste is falsely labeled as non-hazardous, and is processed and disposed of as such, which means that remaining water resources are at risk of future contamination from leaking injection wells, spills, dumping and migration from fracking and fracouts. Greenhouse gas emissions and air pollution must also be assessed for cumulative impacts and social costs now that climate change and its terrible impacts can no longer be denied. BLM must consider a ban on fracking in a programmatic review of cumulative impacts and public health harms. Until the vast inadequacies of existing regulation and oversight are addressed, as well as needed protections for

valuable water resources and public lands are put into place, no further leasing for fracking should be allowed. Ohio's only national forest must be better protected, and a full water balance survey of the region must be done before additional leasing of public lands for fracking is allowed. The lack of accountability and responsibility by our elected officials to protect public health and the environment will be verified and vilified in the future when the harms of fracking and the complicity by our state and federal representatives that allowed those harms can no longer be denied.