December 4, 2016

Kathleen Atkinson

Regional Forester

U.S. Forest Service

Milwaukee, WI

Dear Forester Atkinson,

I am very sorry you are not taking calls from the taxpayers and citizens in Ohio and elsewhere who have grave concerns about extraction of oil and gas on public lands. You have refused repeatedly when asked by the public to look at the EA prepared by the BLM. You have stated (through your delegates) it is not your job to do so and that you are relying on information that is 11 years old, the 2006 Forest Plan and FEIS, to give consent to fracking in our only National Forest in Ohio. There was virtually no horizontal well hydraulic fracking in the Eastern United States 2006. That issue was not materially addressed in the FEIS, leaving the environmental analysis to a future necessary SEIS on the subject of horizontal well, hydraulic fracturing.

By 2012 when the Forest Service’s non-NEPA supplemental information report (SIR) was prepared, there was a wealth of information out of Pennsylvania and West Virginia regarding the very substantial, harmful effects of horizontal drilling hydraulic fracking to the human environment but that SEIS was never prepared. That information was ignored in the SIR. Without any knowledge of what had been happening in the outside oil and gas production and exploration world, the preparers of the SIR concentrated on the 2006 Plan. Of course, without any acknowledgement of new information, the Forest Service could not find any new information, and that is what the SIR reported. Now the BLM has just completed an EA on the same subject, basing ALL of its conclusions on the 2006 Forest Plan and EIS and 2012 SIR. Of course, without any acknowledgement of new information, the BLM did not find any new information. The BLM’s EA does say the Forest Service will perform a Determination of NEPA Adequacy (DNA) at the site-specific level, which is BLM’s equivalent of the Forest Service’s SIR. The outcome of that inquiry is quite apparent. With Eyes Wide Shut, Forest Service will focus inward and find no new significant information.

Judy Henry stated to me you “don’t have to” even look at the BLM’s EA. That of course is a ploy intended to give you deniability. For that reason, I am attaching four documents to this letter, each of which provides you with significant, **NEW** material information regarding the highly detrimental impact of horizontal drilling hydraulic fracturing on the human environment. They are: (1) Executive Order No. 13693 November 1, 2016 regarding Forest Service’s duty to assess the impact of horizontal well drilling hydraulic fracturing on the climate that in turn has very detrimental effects on the human environment, not just Forest Service’s rather finite operations (<https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>); (2) new information on the politically-tinted EPA Drinking Water Study (<https://www.marketplace.org/2016/11/29/world/epa-s-late-changes-fracking-study-portray-lower-pollution-risk>); (3) Bamberger, M., & Oswald, R. E. (2012) *Impacts of gas drilling on human and animal health*, New Solutions, Vol. 22(1), 51-77 (<http://dx.doi.org/10.2190/NS.22.1.e>); and (4) Fracking: Oil & Gas Emissions Linked to Health Problems For Nearby Residents <http://ehp.niehs.nih.gov/1307732/> .

I draw your attention to the BLM’s own manipulation of their EA about health effects of fracking. The EA makes reference to one of the most widely used peer reviewed studies on health effects of fracking by Bamberger & Oswald (see attached report).

This study was used in the Draft EA then *pulled* from the final EA when a public comment brought attention to the fact that the BLM used the study to identify water usage in fracking operations. Here is the first paragraph of the study:

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. As part of an effort to obtain public health data, we believe that particular attention must be paid to companion animals, livestock, and wildlife, as they may serve as sentinels for human exposures, with shorter lifetimes and more opportunity for data collection from necropsies.

And here is the public comment with BLM response:

**Issue/ Condensed Comment**

The authors list Bamberger and Oswald in the bibliography, which is extremely important research that documents the highly significant impacts of fracking to human and animal health. Yet the only reference in the text to Bamberger and Oswald is in reference to the EA's estimate of how much water returns to the surface, which was not the subject of Bamberger and Oswald but merely referenced in that study.

**BLM Response**

This reference was removed from the Final EA.

[Another reference regarding how much water returns to the surface is included in Section 4.7.]

It is inconceivable that a leader in the Forest Service would give the o.k. to contribute to the ill effects of this highly invasive industry in our only National Forest, without thoroughly studying every aspect of its cumulative effects to the people and animal species that live in and near the forest land. Monroe County is already overwhelmed with drilling operations. By allowing minerals in the public domain to be leased this is then your legacy. **“Kathleen Atkinson fracked our forest.”** Please take the hard long look BEFORE leasing can happen. Follow the foresters who took the position that it is more important to do the studies and possibly find parcels that are not suitable for fracking; Bridger Teton (2011), Daniel Boone, George Washington foresters and supervisors all have decisions about doing in depth studies on mineral extraction. There is NO mandate that says available lands MUST be leased. They have been made available by the BLM stating the feds own the minerals. That is the obligation and it is done. You must conduct these studies …now.

There is still time, Kathleen to pull the parcels and reverse consent. It is the right thing to do.

Sincerely,

Roxanne Groff

Bern Township Trustee

Amesville, Ohio 45711

Attachments