Comment on Pending Forest Management Plan for Wayne National Forest.

To Whom it May Concern.

 The Cleveland Divestment Project of the Cleveland Environmental Action Network, hence forth CDP has a mission of insuring that the financial banking and investment policies of public institutions in Cuyahoga County reflect the values of a clean and resilient environment for the residents of Cuyahoga County. We wish to give our input about what a forest plan for the Wayne should include because environmental concerns do not respect political boundaries, or as John Muir stated, “Everything is hitched together.” The priorities of the new forest plan for the Wayne is everyone’s business, not just those who live in Southeast Ohio.

 There is one word that should be first and foremost in mind of planners writing a new forest plan. That word is *water*. Forests are essential to the preservation of watersheds. They provide the sponge of watershed’s ability to store and preserve watersheds for communities that depend on them. The preservation of watersheds was a founding concern of the National Forest system and other forest preservation efforts such as Algonquin Provincial Park in Ontario, and the Adirondack forest preserve in New York State.

 Unfortunately, this mission has been muddied over the intervening decades by other demands to use – and abuse – our national forests. Most disconcerting among these demands is energy development, including high volume hydraulic fracking. We are well aware of existing intentions to frack in Wayne Forest, and are concerned that such activities would have disastrous effects on the local ecology.(\*\*) Cleveland Environmental Action Network supports an outright ban on horizontal drilling in Wayne National Forest. We suggest this ban be written into the revised Forest Management Plan. Shale plays would turn our forest into an industrial zone, complete with wastewater storage ponds, roads and parking lots for vehicles, and the resulting 24/7 noise and light pollution that would totally change the surrounding forest. In a 2017 study, researchers investigated sources responsible for generating noise across protected areas, including areas near extractive land use, and found levels of noise known to interfere with human visitor experience and disrupt wildlife behavior, fitness, and community composition.(\*\*\*)  Fracking the forest would also remove gargantuan amounts of water from Wayne’s water cycle *permanently,* a situation that has gotten worse over time. In a report dated August 15, 2018, Andrew J. Kondash, Nancy E. Lauer, and Avner Vengosh found that water use per frack well has steadily increased from 2011 to 2016.(###). Imagine what that kind of water loss would mean for our waters and the creatures who live and breed there.

 Wayne Forest and nearby areas would also play host to all the complex infrastructure of the trade, including pipelines, compressor stations, dehydrators, processing plants, rail tankers, flare stacks, and storage deports through which oil or gas is moved, filtered, pressurized, warehoused, refined, and vented.(#) Pipelines travel through watersheds, and cross streams and wetlands, and they are known, like all things, to grow old and faulty. Accidents and leaks are common, and rarely detected until after they have caused significant damage. A CityLab investigation used data from the Pipeline and Hazardous Materials Safety Administration to map all significant U.S. pipeline accidents between 1986 and 2016 and concluded, “wherever pipelines are extended, deadly accidents will follow.” Pipeline accidents over the past 30 years have resulted in 548 deaths, more than 2,500 injuries, and over $8.5 billion in damages.(##) . An analysis of records from state agencies revealed that low-pressure flow lines at oil and gas well sites are responsible for more than 7,000 spills, leaks, and accidents since 2009. (####) Just last year (2017) Researchers at University of Albany’s Institute for Health and the Environment prepared a 300-page technical report on the health effects of the emissions from 18 natural gas compressor stations in New York State. The team found that, collectively, these sites released 40 million pounds of 70 different contaminants over a seven-year period, making natural gas compressor stations the seventh largest point source of air pollution in the state. Exposure to these chemicals is linked to cancer, as well as cardiovascular, neurological, and developmental disorders.(%)

 At the end of the fracking process there is also the question of what to do with fracking fluid that is permanently tainted. The industry’s solution is to put it into an injection well. We have heard the claim that wastewater will stay put far below the surface of the land. The problem is that no one knows everything about the geology of the area and how unknown fractures and faults may allow the long-forgotten fluid to seep upward and begin to pollute the watershed.(\*) There is another sobering fact. Once an aquifer is polluted, it is polluted forever. It is easy to make assurances that the fracking fluid will stay put. It is easy to say, “don’t worry.” It is impossible to undo what has been done, once it happens.

 We are furthermore extremely concerned with what may be happening behind closed doors between industry representatives and the government agencies tasked with regulating them. A comprehensive 2017 investigation of the pipeline approval process by the Center for Public Integrity, StateImpact Pennsylvania, and National Public Radio found that the Federal Energy Regulatory Commission (FERC), which is charged with ensuring the public’s interest, routinely assesses need based on company filings and functions as an agency captured by industry interests, concluding, “at every turn, the agency’s process favors the pipeline companies.” The result, according to this analysis of more than 500 pipeline cases, is that the financial interests of the gas industry, and not market demand or public necessity, is driving the ongoing pipeline build-out. Existing pipelines, the investigation noted, run at only slightly more than half capacity. (%%) This observation is not meant to accuse USFS of collusion directly, but it is meant to point out that we are concerned that activities that may at first glance appear to be “regulated” and therefore safe are perhaps not being watched so closely after all, which magnifies our concerns considerably.

 Boosters of Ohio always boast of Ohio having water resources that are the envy of more arid states. They point to plentiful rainfall, our many streams such as the Ohio River, and Lake Erie on our Northern border. It is too bad that they do not talk about the condition of these water resources, which continue to be polluted by energy development. If they do not want to talk about the condition of these water resources, it is important that we do when considering a forest plan for the Wayne. With all due respect to the tradition of multiple use, some “uses” constitute abuses. There are qualities that must be given top billing and be first in line. Water qualifies on all counts for this priority. So, we conclude by stating that in this forest plan that the three most important priorities must be water, water and water. Every other consideration must stand in line behind these top three priorities.

Sincerely,

Randy Cunningham and James Matzorkis

Cleveland Divestment Program of the Cleveland Environmental Action Network

 \*<http://www.dec.ny.gov/docs/materials_minerals_pdf/findingstatehvhf62015.pdf> p5, 12-14

 \*\*W.D. Burgos, L. Castillo-Meza, T.L. Tasker, T.J. Geeza, P.J. Drohan, X. Liu, J.D. Landis, J. Blotevogel, M. McLaughlin, T. Borch, N.R. Warner, Watershed scale impacts from surface water disposal of oil and gas wastewater in western Pennsylvania.

\*\*\* 480 Buxton, R. T., McKenna, M. F., Mennitt, D., Fristrup, K., Crooks, K., Angeloni, L., & Wittemyer, G. (2017). Noise pollution is pervasive in U.S. protected areas. Science, 356 (6337), 531-533. doi: 10.1126/science.aah4783

^ http://coweeta.uga.edu/publications/1544.pdf, http://fwf.ag.utk.edu/mgray/wfs493/petrankaetal1993\_clearcutting.pdf

\*\*\*\*http://library.uniteddiversity.coop/Permaculture/Agroforestry/Forest\_Gardens/Edible\_Forest\_Gardens\_Vol.1-Vision\_and\_Theory.pdf p12-13

# http://concernedhealthny.org/wp-content/uploads/2018/03/Fracking\_Science\_Compendium\_5FINAL.pdf p193

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