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First name: Athens

Last name: Fracking Action Network

Organization:

Title:

Comments: intro and packet #1 for Wayne Plan Revision - 2008 Ec Analysis of 2006 Plan; Myers et al. 2013: PNAS Human health impacts of ecosystem alteration; Tick-borne disease and Forest...submitted by H Cantino 8-18

Please acknowledge receipt. Thank you.

To Wayne Plan Revision Team

wayneplanrevision@fs.fed.us

Intro and packet #1 submitted by Heather Cantino 8-18

Dear Planning Revision Team,

This constitutes the first of many packets I intend to submit on behalf of ACFAN, Buckeye Environmental Network and other signatories, below.

We expect all submitted documents to be evaluated in your planning revision process. Some submissions will be re-submissions of testimony, research, and analysis previously submitted by Buckeye Forest Council, Athens County Fracking Action Network, Heartwood, professional biologists, and myself on issues that have yet to be addressed by the Wayne in a NEPA-based evaluation of forest actions.

This includes extensive relevant and substantive arguments objecting to:

- 1) the highly flawed 2006 Wayne National Forest Plan, which was legally contested at the time by Heartwood, Buckeye Forest Council, and Sierra Club (press release attached),
- 2) USFS permission to the BLM to lease Wayne land for fracking without the USFS ever conducting a NEPA-based evaluation of fracking, in spite of the current 2006 plan not having evaluated this new technology and its now clearly apparent highly significant impacts on the forest and community,
- 3) destructive timber sales, prescribed burns, and other mismanagement activities that conflict with USFS's congressional mandate to provide economic benefit to the American people and to take into consideration all potentially significant economic and environmental impacts, including longterm climate impacts, of Wayne Forest actions on the community surrounding the Wayne and on the well-being of the American people in its decision-making for any and all significant actions.

In addition to previously submitted materials, we will be submitting other relevant and up-to-date research addressing USFS's legal responsibility to protect ecosystems and ecosystem services of the highest value for present and future generations, addressing cumulative impacts of all significant actions to be authorized by the new Plan. Two such research articles with extensive relevant references are attached.

Although the Wayne has been consistent in undermining NEPA in its decision-making actions over past decades, as documented by previously submitted objections and the Wayne's consistent refusal to abandon short-sighted industrial and industry-biased management policies to reflect up-to-date science and serve the economic interests of the American people, we submit these materials in hopes that this team will honor your legal and

ethical responsibilities to the American public and for the future of our public forest so that the public interest will finally be served.

Please evaluate the following significant issues in your consideration of how the new Plan must differ from the highly flawed and illegal 2006 Plan.

Items 1-4: Attached find the 2008 Economic Analysis of the 2006 Wayne National Forest Plan and separate summary and recommendations and press release. Please provide documentation of how the new Plan will address each and every issue raised in this important critique of the previous plan by environmental economists. Please also address the points raised in the May 2006 press release regarding the lawsuit against the 2006 Plan (attached) , which was not satisfactorily addressed, and how the next Plan will address economic benefits of intact public forests, ignored in spite of widespread public outcry preceding the 2006 Plan.

Items #4-5 Attached also find the PNAS research article, Human health impacts of ecosystem alteration, Samuel S.. Myers et al. , PNAS , Nov. 19, 2013. 110 (47) pp. 18753-18760; (also available at <https://doi.org/10.1073/pnas.1218656110>), offering extensive relevant peer-reviewed conclusions and references. Please address how the new Wayne Plan will evaluate the effect of proposed Plan activities on human health and ecosystem services, given the ecosystem degradation and degradation of the forest's environmental services that result from logging, burning, fracking, ORV, and other industrial management activities, which have been so far given priority by the Wayne and the 2006 Plan (with a caveat that the 2006 Plan did not even consider fracking, so that subsequent decisions to open the Wayne to fracking are contrary to NEPA and being challenged as such by CBD et al in ongoing lawsuits).

It is understood that evaluating impacts of Wayne activities is challenging, given that, as the PNAS research authors state (p. 18757), "...many of the relationships we are interested in involve the loss of a protective service as opposed to the presence of a risk. Viewed through a burden of disease lens, the burden is, paradoxically, generated by the loss of a protection not the presence of an exposure. As a result, we are concerned with calculating the 'disease averted' that is associated with a natural system in a particular state... As we expressed earlier, the burden of ecosystem alteration may be disproportionately experienced by future generations." In spite of the difficulty of doing so, it is clear that impacts are significant, cumulative, and long-term and therefore, as required by NEPA, the Wayne Plan Revision team must evaluate and document how its planned activities will not exacerbate loss of protections and cause significant longterm burden on future generations. Please address all significant issues raised in this research review and relevant references cited.

Also attached is a more current research article (Tick-borne disease risk in a forest food web, R. S. Ostfeld et al., Ecology, 99(7), 2018, pp. 1562-1573, Ecological Society of America), which addresses the importance of forest cover in stemming the rapidly increasing and spreading tick-borne Lyme disease. Given that Lyme is just coming into SE Ohio and the region of the Wayne, the Wayne must evaluate, in all future logging, burning, and ORV decisions, the impact of such forest destruction and fragmentation activities on human health from spread of Lyme disease into our region. Please evaluate implications of this up-to-date research and document this evaluation in your new Plan process.

We look forward to a complete evaluation of all relevant issues raised in the accompanying documents.

Sincerely,

Heather Cantino, Steering Committee Chair,

Athens County Fracking Action Network

on behalf of

Athens County Fracking Action Network

Buckeye Environmental Network (formerly Buckeye Forest Council), Roxanne Groff, board chair

Jean Andrews andrewj4@ohio.edu, Documentary Video Producer, "A Forest Returns: The Success Story of Ohio's Only National Forest as Told by Ora Anderson"

Concerned Citizens of New Concord Muskingum County, OH 43762

Meghan Wynne, Organizer,