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First name: Heather

Last name: Cantino

Organization:

Title:

Comments: Packet #12: legal arguments and citations for evaluation of climate impacts of all proposed Plan activities

Packet #12

While the attached addresses the BLM and the need for a programmatic EIS on oil and gas leasing, its legal arguments, references, and science are of utmost relevance to the Wayne's upcoming new Plan development. The rigor with which climate impacts of Wayne actions must be assessed applies both to oil and gas leasing consent decisions, i.e., making parcels available to lease for fracking, as well as to logging, ATV, and prescribed burning activities that may be proposed for the Wayne under a new Plan. Given the extreme climate breakdown now occurring and accelerating daily, all activities considered in the new Plan, whether in the 2006 Plan or not, must be assessed in an EIS-level analysis for short- and long-term climate impacts, including of course all downstream impacts, as well as cumulative climate impacts. Potential effects of a proposed action must include quantified GHG emissions for all projected emissions (not just for CO2 but of course for methane as well, using the latest equivalences (88-108, not 25 or whatever other outdated equivalents the industry likes to use!), as well as impacts of climate change on the potential impacts of the action.

Sincerely,

Heather Cantino, Steering Committee Chair,

Athens County Fracking Action Network, acfanohio@gmail.com

on behalf of

Athens County Fracking Action Network, acfan.org, acfanohio@gmail.com

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

Jean Andrews, Documentary Video Producer, "A Forest Returns: The Success Story of Ohio's Only National Forest as Told by Ora Anderson", 7 Robin Hill La

Concerned Citizens of New Concord Muskingum County, OH 43762

Meghan Wynne, Organizer

----- Forwarded message -----

From: Heather Cantino

Date: Fri, Jan 22, 2016 at 7:50 PM

Subject: supplement WEG to H Cantino comments re DOI-BLM-Eastern States-0030-2016-0002-EA

To: blm\_es\_comments@blm.gov, "Scardina, Anthony -FS"

Attached find a legal petition re the need for BLM to issue a moratorium on oil and gas leasing and conduct a PEIS of its oil and gas leasing program based on social costs of carbon, BLM's outrageous contribution to ghg emissions and climate change from current and untapped oil and gas under its control, and non-climate impacts of this program. Please enter this petition in its entirety into the public record as a supplement to my comments on the DOI-BLM-Eastern States-0030-2016-0002-EA and please address all of the points made here in your response to my objection to proposed leasing of oil and gas under the Wayne.

The economic costs of BLM's leasing program and more narrowly of the Wayne leasing proposal far outweigh any benefits to the American public and must be assessed through a BLM programmatic EIS as this petition elucidates as well as the Forest-wide EIS by the Wayne based on the 2006 Forest Plan's total inadequacy to evaluate climate and non-climate impacts of fracking on the human environment.

Also at

[wildearthguardians.org/site/DocServer/APA\\_Petition\\_BLM\\_WildEarth\\_Guardians\\_1\\_18\\_\\_Final\\_.pdf](http://wildearthguardians.org/site/DocServer/APA_Petition_BLM_WildEarth_Guardians_1_18__Final_.pdf)