

Data Submitted (UTC 11): 8/12/2025 1:36:50 AM

First name: Arthur

Last name: Jenkins

Organization:

Title:

Comments: I thank the Forest Service for the opportunity to comment on the Draft Environmental Assessment (EA) concerning oil and gas leasing in Conecuh National Forest.

My major concerns and comments regarding the draft EA are as follows:

1. The proposed action (Alternative B) as well as the only slightly more restrictive Alternative D allow leasing in areas that are of great importance to recreational activities (Open Pond, Blue Spring), water resources (Yellow River), and rare/imperiled species (gopher tortoise colonies, gopher frog ponds, pitcher plant bogs). It is unreasonable to allow oil and gas leasing in these areas and they should be closed to leasing all together. As such, alternative D in its current form does not represent a reasonable "middle ground" alternative.
2. None of the alternatives considered more restrictive lease stipulation types or exclusion of leasing for areas of importance to populations of federally listed and state protected species. The alternatives should, at a minimum, give NSO stipulations to known areas with high densities of rare plants, major gopher tortoise colonies, gopher frog populations, and red-cockaded woodpecker clusters.
3. Alternative D is stated as likely to have fewer impacts on Vegetation Communities, Wildlife, Water Resources, Soils, Recreation/Special Use, Scenery, Cultural Resources/Tribal Interests, and Socioeconomic Conditions when compared to Alternatives A/B. If there are so many advantages to Alternative D (and likewise Alternative C), then why is Alternative B being considered as the "proposed action?" How can these impacts be excused for a project in which not a single permanent job is created in the local community? The draft EA document fails at a fundamental level to justify the proposed action.
4. This EA considers impacts based on the "Reasonably Foreseeable Development Scenario" estimate of 11 new wells. However, this estimate is not stated as a limit. Language should be included that clarifies this and states that there must be a new EA to consider impacts from additional wells beyond the 11 considered in this EA.
5. At approximately 85,000 acres, Conecuh National Forest is one of the smallest, yet one of the most biodiverse, national forests in the United States. It provides important habitat for numerous imperiled species and recreation opportunity on public land which is limited in south Alabama. The damage and potential risks to wildlife, ecosystems, and recreational resources in Conecuh National Forest outweighs any benefits from further oil and gas extraction. This is implied throughout the "Environmental Impacts of the Proposed Action and Alternatives" section of the draft EA. As such, logic dictates and I request that the "proposed action" be switched from Alternative B to Alternative C in which there is no new oil and gas leasing.

In Conclusion:

As the last large tract of intact longleaf pine ecosystem in Alabama, Conecuh is perhaps the most biodiverse national forest in the United States and is home to numerous rare and imperiled species such as gopher tortoises, indigo snakes, gopher frogs, pitcher plants, and Gulf sturgeon. Whether it's camping at beautiful Open Pond, hiking through sandhills and pitcher plant bogs on the Conecuh Trail, swimming in Blue Spring, hunting the open longleaf savannah, or paddling the Yellow River, Conecuh provides numerous recreation opportunities. All of these areas will be available for oil and gas leasing under the proposed action (Alternative B).

It is my position that there should be no new oil and gas leasing in Conecuh National Forest. At a minimum, leasing of any kind should not be allowed in recreation areas, sensitive habitats, and areas occupied by species of conservation concern. Expected to provide zero permanent jobs for the local community, additional oil and gas leasing is not worth the risk to wildlife, recreation, and water resources.

I appreciate the opportunity for input on the draft EA and the consideration of my comments in this letter by the Forest Service.