Data Submitted (UTC 11): 6/30/2013 4:28:08 PM
First name: Phillip
Last name: Doe
Organization: Be the Change
Title: Environmental Director
Comments:

We believe any EIS the USFS produces with regard to the leasing of public land under its trust for oil and gas development must address the following issues in serious detail:

1. The recent federal court decision in which the BLM was severely criticized for not measuring the cumulative impacts of its oil and gas leasing program and told to do so forthwith should be formative. (See Center for Biodiversity and the Sierra Club v The Bureau of Land Management, CN 11-06174 PSG in the U.S. District Court for the Northern District of California in San Jose, CA.)That decision makes it imperative, not just from a public interest standpoint, the highest imperative in our opinion, that the EIS treat in detail the impacts of leasing on air, water, wildlife, natural habitat, human health, and local and regional economies that may be impacted by the federal leasing program.

Numerous economic studies are starting to warn that the long term impacts on local economies will be devastating as the oil companies move out, with their pockets full after production lags, leaving environmental clean up and reestablishing new economies to locals. The potential for this economic future becoming an ugly reality must be discussed thoroughly.

We understand measuring and making pubic the many aspects of extensive leasing for oil and gas development is a large order, but this requirement is not nearly as far reaching as the trust responsibility of protecting public land for future generations. We're sure the agency agrees with us as to the importance of this hierarchy of responsibilities.

The notion, too long held, that leasing is not tantamount to drilling is specious. Of course, the oil industry intends to drill, otherwise it would not lease. It is not in the business of establishing nature preserves. Indeed, it is really a basic chicken and the egg question. The government has to admit the request for leasing from an oil company is a desire to explore, and that exploration brings with it a host of foreseeable and measurable impacts that must be accounted for.

2. We understand the recent government study on climate change, in which Forest Service scientists participated, warns of a doubling in wildfires annually over the next few years if climate change continues on its present pace. Additionally, the study posits that in some areas of western Colorado a 500 percent increase in fire activity may become a reality. Shouldn't these projections require a mapping of fire prone areas that might not be suitable for development of any kind, including oil and gas development. Development would only increase the human and economic costs, the latter of which fall disproportionately on the public at large.

Within this analysis, there should be a serious examination of water use and availability within these areas of high vulnerability.

3. If any added incentive is needed to doing a scientific analyze that establishes and preserves the primacy of protecting public property for this and future generations, the recent survey, Hart Research Associates, in which the American people expressed a strong interest in protecting public land. In that survey 65 percent of western American's surveyed expressed a desire to protect public land over using it for oil and gas development. Only 30 percent of westerners would support oil development over environmental protection. That disparity is compelling

in favor of nature and the future.

Respectfully,

Phillip Doe
Environmental Director
Be the Change
ptdoe@comcast.net
Sent from my iPad

Weston Wilson
Chief Science Advisor
Be the Change
anwwilson@comcast.net