Save Our Parks

8/22/23

Dear Director Mertz, Governor DeWine, Chair Richardson, Ohio Oil and Gas Land Management Commission,

Thank you for reading and addressing the concerns of this email related to the public process of public lands overseen by the Ohio Department of Natural Resources. This email will address the Ohio Oil and Gas Land Management Commission (OGLMC) outreach and comment process during the leasing nomination process as well as the Ohio Statewide Comprehensive Outdoor Recreation Plan to be submitted to the National Park Service in compliance with Land and Water Conservation Fund.

1. The nomination process of Ohio public lands to the Oil and Gas Land Management Commission (referred to as OGLMC) has not been comprehensive. There has been a lack of outreach to Ohio citizens regarding the nominations of their public lands by the oil and gas industry. There has been no strategic method of obtaining the comments of the Ohio citizenry by the OGLMC/ODNR. As evidenced by the methodology of the Ohio Statewide Comprehensive Outdoor Recreation Plan, surveys and outreach can be successfully administered to the Ohio citizenry by ODNR.
2. The Ohio Statewide Comprehensive Outdoor Recreation Plan (SCORP) 2023 survey lacked any questions regarding the leasing of public lands and the public opinion related to the proposed leases. With an extensive survey base administered through consulting groups, it would have been possible for ODNR to have gleaned information regarding the public sentiment regarding the impacts of oil and gas leasing to the state public lands of Ohio. The 2023 SCORP will be the third submitted to the National Park Service, Land and Water Conservation Fund since the passage of HB 133 in 2011. The 2013 and 2018 SCORP reports were not faced with imminent oil and gas leasing as the 2023 SCORP has been. Governor Kasich did not appoint an oil and gas commission as Governor DeWine has done. This 2023 SCORP report will then be submitted to the National Park Service, to comply with Land and Water Conservation Fund criteria. We argue this is a flawed process that should have allowed the citizenry of Ohio to respond to questions related to industrial extraction on their state public lands. Among the 51 main questions with 102 possible associated questions, no survey questions addressed the leasing of oil and gas minerals on our public lands.

**OGLMC Nominations oversight**

The OGLMC has been the overseeing agent to receive nominations for leasing of all state public lands following HB 133 legislation instituted in 2011. During the time since rules were instituted on May 28, 2023, the OGLMC has received 14 nominations for leasing of Ohio citizen public lands. The agency overseeing this is ODNR. The OGLMC created a website and posted nominations as well as the comments received. However, there was no citizenry outreach conducted. There were no efforts on the part of ODNR to post this on their website, facebook, or conduct surveys within the parks and wildlife refuges under the nomination process*.* In fact, when staff were asked about this in the two parks that have been nominated for oil and gas extraction, Salt Fork and Wolf Run, they said they were not allowed to discuss the issue.  *In short, no effort was made by the OGLMC to ensure that the comment for these nominations was representative of the Ohio citizenry.*

**The Ohio Statewide Comprehensive Outdoor Plan**

The SCORP is a five-year strategic plan that guides state and local investments for developing and managing outdoor recreation and facilities. ODNR designed a public input process to gather information on Ohio residents’ outdoor recreation behaviors, needs, and priorities. According to the SCORP report, “Efforts were made to ensure the process allowed for the inclusion of voices from different communities, demographic groups, and interested parties who may be directly or indirectly affected by the decisions. As part of this process, ODNR created an Advisory Committee, developed an Ohio resident online survey, conducted outdoor recreation provider interviews, held listening sessions, and conducted qualitative panel interviews.” (Ohio Scorp, draft, 2023, p 8.)

However, the survey (attached) did not address the potential threat of industrial scale oil and gas extraction on or adjacent to our state public lands. According to the survey document, “ there was a total of 6,214 surveys submitted during the 3-month open period. The survey was closed on February 1, 2023. On the close date, there were 5,291 submitted surveys and an additional 923 surveys still in progress (incomplete). The in-progress surveys remained open for an additional 48 hours. After the 2-day period, all in progress surveys were closed, adding 657 submitted surveys to the total (5,948) and 266 unsubmitted. The unsubmitted surveys were not included in the analysis. On average, 74% of the survey was completed by respondents, with a median duration of 22 minutes to finish.” (SCORP report, 2023, p 7)

Based on public input and the results of the year-long planning process, the following strategic priorities were developed for the 2024-2028 SCORP: (Ohio SCORP draft 2023, p. 10)

• *Advance the trail network by focusing on completing trail projects that fill gaps, complete long-distance trails, build connections with existing trails, and create connections within and between communities.*

*• Improve, enhance, and adapt existing recreational facilities, focusing on incorporating sustainable design concepts, integrating technology and safety enhancements in upgrades and improvements, and ensuring projects have sustainable maintenance plans and community support.*

*• Emphasize recreational opportunities and access to Ohio’s waters, focusing on projects with access and amenities for paddling sports, increased wayfinding on waterways, and messaging about water access opportunities.*

*• Improve awareness and access to outdoor recreation opportunities to increase familiarity with nearby recreational opportunities and increase engagement and participation in outdoor recreation.*

*• Protect and sustain the natural environment to continue the legacy of conserving high-quality natural resources and providing appropriate outdoor recreation experiences in areas that can sustain use.*

According to the SCORP draft, “These priorities will advance and improve Ohio’s outdoor recreation, promoting stewardship, conservation, and awareness of the natural world. In working toward these goals, Ohio will enhance outdoor recreational experiences, improve access, and provide quality outdoor spaces for all to enjoy.” Ohio SCORP draft, 2023, p 10.

**We argue that the industrialization of Ohio public lands through oil and gas extraction are not compatible with the above strategic priorities.**

**Ohio Oil and Gas Land Management Commission and Ohio SCORP 2023**

1. Utilizing the data from the SCORP survey, we believe that the process of the comments through OGLMC is highly flawed and should be reinstituted to implement a methodology that seeks citizen input. This would require a new nomination process and a strategic plan to outreach to the citizenry of Ohio.
2. The SCORP report fails to address the imminent threat of the industrialization of our state public lands and therefore should be reimplemented with survey questions that ask the citizens of Ohio, their perceptions and beliefs around the extraction of our Ohio State Parks, Wildlife Areas and other public lands. We therefore strongly urge the ODNR not to submit this report to the National Park Service **until the survey accurately reflects the reality of the state of Ohio public lands.**

Finally, we respectfully request a response from Director Mertz, Governor DeWine and the Oil and Gas Land Management Commission representatives to these requests.

Best regards,

Save Ohio Parks Steering Committee