**Supplemental Environmental Assessment Comments**

**DOI-BLM-Eastern States-M000-2023-0005-EA**

**Comments provided by: Vic Elam, resident of Washington Co., OH**

The comments provided below are with the understanding that site specific planning will occur upon approval of APD’s.

**I encourage the adoption of Alternative A – No-Action alternative for the reasons stated below.**

As described in the “1.2. Purpose and Need” section of the EA “BLM’s responsibility is “to make mineral resources available for development to meet national, regional, and local needs.” I asked what the need is that we are addressing with this action and the response was a totally inadequate version of fossil fuel industry endorsed talking points about the, and I am paraphrasing, need to extract gas to support our economy, jobs, provide for our energy needs as we continue to transition to renewable energy.

My objection to that premise is primarily that although I can’t put my fingers on any statistics to show it. There seems to be excessive gas reserves in this region that are already being produced, in fact there have been all matter of efforts to find uses for this excess of gas – such as the new Shell Polymers plant along the Ohio River and efforts to establish Blue Hydrogen production with carbon capture. The Mountain Valley Pipeline if/when constructed is intended to move this excess gas to the east coast where it can, among other uses be shipped overseas – contributing to global warming. I would argue that none of these uses and others are needed. Plastic is so readily available that it has become an environmental nightmare.

Also, the jobs and economy part of it does not work in Appalachia – this area has a long-storied history of outside entities coming in and removing the areas treasures, yet the local population continues to suffer low paying jobs and unemployment and the populations continue to dwindle.

Also in 1.2 the language, “BLM’s oil and gas leasing program encourages the sustainable development of domestic oil and gas reserves…” seems counter to extracting a finite resource, in fact I would argue that it might be in this country’s best interest to conserve the gas for potential future need. When questioned at the public hearing the response again was totally inadequate, something about BLM’s definition of sustainable is different. It didn’t make sense to me.

In regard to the emphasis of this revision, wildlife populations will undoubtedly suffer, particularly mussel populations and the fish that they rely on for their life cycles. According to federal records obtained through FracTracker, Washington county producers reported 14 accidental releases or spills during 2023. The primary concern is brine disposal, considering that brine is composed of salt water, which has been shown to cause major mortality events especially with mussel glochidia and young mussels. But saltwater is relatively innocuous compared to the radioactive content, heavy metals, and hundreds other compounds considered toxic, and as has been recently revealed PFAS or forever chemicals. I would like to encourage BLM to require extraction companies to divulge the content of substances used in drilling and fracking wells and not allow any forever chemicals.

Brine trucks are a constant on the roadways of this area and often overturn and spill their loads. A spilled brine truck load no matter where, has the capacity to contaminate and kill large stream sections and what’s worse with EPA limits of 4 parts per trillion on PFAS the Ohio River and everyone downstream are at risk. Also, if forever chemicals are being used that means that they are being produced somewhere and the production of these chemicals in and of itself is problematic.

Pipelines are a serious concern for me as well. Stream crossings are inevitable as are broken pipes. Both are likely to result in environmental degradation.

As identified as a concern by the U.S. Fish and Wildlife Service, source water for fracking is a major concern and I echo the concerns identified by the USFWS. I also feel that companies should divulge where the source of the water is, and a determination made by USFWS that no harm will come from extracting that water. I feel that limiting the scope of that concern to immediate area streams may only cause problems elsewhere. In stream flow must be maintained for mussel health, prevent excessive water temperature swings, reduce predation, maintain fish populations, protected from excessive sedimentation, protected from contamination, etc.

There is an environmental justice component to all this that I will leave to others, and I could go on with reasons not to go forward with allowing gas extraction from the Wayne NF. I have supported the Wayne in the past when they were under attack for some proposed actions such as timber sales, even though I might disagree with the action, I understand the USFS multiple use mandate. Same goes for the BLM and their mandate to make minerals available, but in this case I feel that the overwhelming potential for harm and the inability to demonstrate a real need, should tip the scale toward conserving those resources for future generations that may truly need them.

Thank you for considering my arguments.