



March 23, 2020

**Re: Plan Revision, Wayne National Forest – Comments on the Draft Assessment Report**

Dear Forest Plan Revision Team,

The Ohio Environmental Council submits this petition comment, along with more than 1,000 petition signatures endorsing.

As the largest public forest in Ohio, the Wayne National Forest is Ohio's best nature-based option to address climate change. Maximizing the Wayne's capacity to fight climate change through "proforestation" is also the best way to protect habitats and recreation opportunities. We urge you to examine proforestation in the Assessment Report and we urge you to protect the Wayne.

**Proforestation and Climate**

Proforestation — allowing forests to grow intact to their natural potential — is the most effective, immediate, and low-cost nature-based approach to remove significant amounts of carbon dioxide from the atmosphere. (Moomaw et al. 2019).

**Proforestation and Habitat**

Ohio needs to recover its old-growth forests. The state was once dominated by old-growth forests, but today they are almost completely gone.

The mighty white oak, a flagship old-growth tree, may be the single most important tree for wildlife. But white oak is being harvested unsustainably in southeast Ohio — it declined nearly 25% in the region between 2006 and 2016. The imperiled cerulean warbler and the state-endangered American black bear are especially dependent on mature white oaks for raising their babies. And, both the warbler and the bear prefer expansive deep woods habitat. Proforestation on the Wayne will protect the white oak and the wildlife that depend on it.

**Proforestation and Recreation**

We want our National Forest, the Wayne, to once again boast wide and deep expanses of awe-inspiring old-growth forest. Fully realized, old-growth forests offer uniquely potent aesthetic, experience, and recreation values. We want the Wayne National Forest to reach its fullest ecological potential. And we are not alone. The rise of organizations and citizens promoting deep-woods recreation has increased dramatically in recent years. As you draft the final Assessment Report, we call on you to recognize the public demand for expansive old-growth forest.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nathan Johnson', followed by a long horizontal flourish.

Nathan Johnson  
Public Lands Director  
Ohio Environmental Council  
1145 Chesapeake Ave., Suite I  
Columbus, OH 43212  
614-487-7506  
[NJohnson@theOEC.org](mailto:NJohnson@theOEC.org)