

Data Submitted (UTC 11): 1/18/2022 3:20:18 PM

First name: Christine

Last name: Hughes

Organization: Village Bakery & Cafe

Title: owner

Comments: The new EA for the Orphaned Well and Abandoned Mine Project is dramatically different from the initial announcement for the current project, a Scoping document issued in August, 2021, which makes no mention of Wayne plans to request exemptions from Plan rules. Thus no one saw any danger or critiqued the project at that time. The Wayne is functioning under a Plan in which climate change, carbon emissions from soil disturbance, and bat white-nose syndrome were not considered. With increasing evidence of the role of old trees to forest health and climate protection, the USFS cannot allow any degradation of their already inadequate 2006 Plan to inform decision-making. As noted environmental scientist Bill Moomaw points out, the largest 1% of trees in a forest store about half the forest's carbon. And, contrary to earlier assumptions, research documents that trees continue adding carbon throughout their lives. A single big tree can absorb the same amount of carbon in just one year as is contained in an entire mid-sized tree. One of the most important things we can do, in addition to reducing carbon emissions, is preserve existing forests intact to allow trees to grow large. The term "proforestation" distinguishes this strategy from both reforestation and afforestation - planting trees where there was no forest before. Protecting existing forest and allowing it to develop into old growth is far more effective to combat climate change than planting trees, given the magnitude of carbon removal we now require in a very short time frame.

In addition, the USFS cannot justify ANY bat takings or destruction of habitat when our bat species are so threatened (usgs.gov/news/national-news-release/white-nose-syndrome-killed-over-90-three-north-american-bat-species: "White-nose syndrome has killed over 90% of northern long-eared, little brown and tri-colored bat populations in fewer than 10 years, according to a new study published in Conservation Biology.").