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Comments: The project proposal gives no information on number, location, or condition of wells that were previously slated to be plugged under the 2006 Plan or any information on the locations, emissions levels, or accessibility of wells now proposed to be plugged. The Forest Service gives NO data on projected environmental costs and benefits of the Project.

The public demands that we be given information about this Project to include the following, as well as that there be timely and transparent consultation with the public before particular wells are prioritized and selected for intervention. We must be given an opportunity to weigh in before site-specific decisions are made, when there is much momentum and no opportunity to object. Information that should be available to the public for comment includes answers to these questions:

1. How many wells have been capped/plugged under the current plan? What is their condition? What was the cost of each? Has the capping/plugging been effective? How much disturbance of soil, wetlands, and vegetation (quantified by carbon emissions, acreage, tree volume, species, and number) was required to achieve these results?

2. How are the wells slated for intervention being prioritized? What are the environmental costs and benefits (including ghg emissions, destruction of habitat and wetlands, logging, road building, and soil compaction) of each intervention? Why hasn't the FS shared the maps and emissions data of wells to be plugged or capped? This must happen immediately.

3. How will the public get to weigh in to assure that destruction of "mature" and old-growth trees, bat and other sensitive species habitat, and wetlands will not occur, since the Wayne has exempted itself from obligation to protect these Forest resources? (The Wayne has a history of logging 60-80 year-old trees, selling them at give-away prices to the logging industry, having labeled them "mature," though these trees are young in terms of their natural lifespans of 200-400 years or more.)

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.[i] 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.[ii] (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. Coined proforestation by Moomaw, the term distinguishes this strategy from both reforestation and afforestation (planting trees where there was no forest before. While planting trees is often promoted as a means to combat climate change, protecting existing forest and allowing it to develop into old growth is far more effective, given the magnitude of carbon removal we now require in a very short time frame.[iii] ) See also K J Beiler, SW Simard, and DM Durall. Topology of tree-mycorrhizal fungus interaction networks in xeric and mesic Douglas-fir forests. Journal of Ecology, February, 2015, doi: 10.1111/1365-2745.12387l.

How does the FS 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.")

The Wayne National Forest staff and director need to be thinking about ecological health. This project, as it is proposed, is absolutely disaligned with that, as well as their mission. Dismissing the value of EA is something even a child can recognize as a bad decision. It will not save costs in the long run. It will not result in better ecological health, even under the guise of capping orphaned wells. Do it right, or why do it all?

[i] W. R. Moomaw, et al. Intact forests in the United States: Proforestation mitigates climate change and serves the greatest good. Frontiers in Forests and Global Change (2019). https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full

[ii] N.L Stephenson, et al. Rate of tree carbon accumulation increases continuously with tree size. Nature 507, 90-93 (2014). https://www.nature.com/articles/nature12914
[iii] Peterson, K.S. The push for standing forest protections in US climate policy. Environmental Health News (2021). https://www.ehn.org/forest-carbon-sequestration-2649749746.html