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Organization: Bulk - Ohio Environmental Council

Title: Senior Attorney

Comments: Dear United States Forest Service:

This comment is submitted on behalf of the Ohio Environmental Council (OEC) and three hundred and sixty-six (366) signatories. These signatures and individualized comments from eighty-eight (88) of the signatories are being submitted with this filing as an Excel spreadsheet.

While we believe the U.S. Forest Service's effort to recognize old-growth forests is a step in the right direction, we also believe it falls far short of ensuring meaningful change and protection for existing old-growth forests, and for mature forests that could one day recover old-growth characteristics and status.

First, the Draft Environmental Impact Statement (DEIS) for the proposed National Old-Growth Amendment (NOGA) frames the issue of old-growth primarily in terms of how USFS can and should log old-growth forests to make them more "resilient." I urge the Forest Service to instead prohibit commercial logging of the old-growth forests under its care.

Second, the NOGA does not actually require that any acres of national forest be set aside for the recruitment and recovery of future old-growth. Very few old-growth tracts exist in the eastern United States, Ohio included. Despite the fact that old-growth forests historically dominated the landscape. It is vitally important that substantial tracts of mature forest in the National Forest System be identified and protected for old-growth recovery. I urge the Forest Service to update the NOGA to include real, measurable mandates and targets for the recruitment of future old-growth forests. We need to bring back old-growth forests in a big way: For climate. For biodiversity. For outdoor recreation and the economy. To help make the connections between people and nature stronger. To make our nation stronger.

Please update the National Old-Growth Amendment to require the recruitment of substantial tracts of old-growth forests. And please prohibit commercial logging in old-growth and future old-growth in the National Forest System.

ATTACHMENT OEC MOG Comment 9-20-2024.pdf is letter text above.

ATTACHMENT Petition\_0824OldGrowthActionAlert\_signatures\_2024-09-19\_14-35.xlsx is petition signor names with the following additional text

ADDITIONAL TEXT FROM PETITION SIGNORS:

Dear United States Forest Service: While I believe the Forest Service's effort to recognize old-growth forests is a

step in the right direction, I also believe it falls far short of ensuring meaningful protection for existing old-growth forests. First, the DEIS for the proposed National Old-Growth Amendment (NOGA) frames the issue of old-growth primarily in terms of how USFS can and should log old-growth forests to make them more "resilient." I urge the Forest Service to instead prohibit commercial logging of the old-growth forests under its care. Second, the NOGA does not actually require that any acres of national forest be set aside for the recruitment and recovery of future old-growth. Very few old-growth tracts exist in the eastern United States, Ohio included. As a former employee of Inyo National Forest in California, I understand the mission of the FS and urge you to protect and create old-growth forests for future Americans to enjoy.

Please protect old growth forests

It has already been proven that old growth trees are better at absorbing and already hold lots of pollutants. Plus they are beautiful and ancient. Don't cut them!

I would add that controlled burns to provide the 'resilient' aspect would be needed. That is part of the ecological history of Ohio forests. In the letter the meaning of 'logging' is unclear and may support removal of large trees that would normally remain after a surface burn. I do not support this kind of removal as it would change the natural ecosystem balance and could result in loss of stored carbon as well as habitat.

Please protect habitats and our old growth forests with meaningful change. This is critical to our own health and the health of our planet.

I agree with this comment: update the National Old-Growth Amendment to require the recruitment of substantial tracts of old-growth forests. And please prohibit commercial logging in old-growth and future old-growth in the National Forest System.

We as a nation absolutely need to prioritize old growth forests as critical habitat that may vanish from our country without such protections.

As a physician, I utilize green space to help patients manage their mental health challenges and to improve their physical health. Please protect forest and all green space

Protect our oxygen supply. Protect our forests.

Old growth forests need to be expanded in Ohio to make my state better equipped for climate change.

Old growth defines itself, it is resilient by existing. We need to protect what very small areas of old growth remain, and manage mid-aged forests so that they too, eventually, will grow into mature older growth. The last thing we need to do now is remove old growth. Please preserve the few remaining areas of both limited and extensive old growth, this is where the greatest biodiversity resides.

We have no choice but to be serious about protecting nature for our physical and mental health. Please update the National Old-Growth Amendment to require the recruitment of substantial tracts of old-growth forests. And please prohibit commercial logging in old-growth and future old-growth in the National Forest System. There is no time to waste.

We can do more

Large trees store more carbon than smaller ones. Bill Moomaw has pointed out that the largest 1% of trees in a forest store about half the forest's carbon. One of the most important things we can do to combat climate change is preserve existing mature and old-growth forests.

Ohio has very little old-growth forest remaining. All remaining old-growth forest must be completely protected from logging or any other type of damage, destruction or exploitation.

Thank you for protecting our future by preserving these trees

You must protect Ohio's forests for future generations!

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please! Set aside these natural forests so they can grow and mature! Being in nature is good for the human psyche, and provides much needed tranquility for many people and a habit for animals of all kinds.

Please do all you can to save our forests!

We need to protect our old trees!

There are so few Old Growth forests left in Ohio, forests that take many centuries to form. Please truly protect Old Growth forests in the Wayne National Forest and elsewhere in Ohio.

Old growth forests are NOT replaceable. Their Let them be safely.networks are unique and greatly improve our world environment.

Old growth forests add resilience , hydration, beauty, biodiversity and strength to a society that increasingly has none of these qualities. Supporting and increasing the small fragments of a once vast system is very basic to stewardship and self respect. Mark Cohen

Our forests consist of ecosystems linked with and important to our own survival. So much has already been destroyed without understanding how it supports our own existence. Please protect the forests for our public health and wellbeing as well as the health and wellbeing of our natural world.

If someone stunts the growth of a child, there is no way to retrieve what has been lost. The same with forests. We need to let some, at least, grow as nature intended, so we can learn their potential - which is much beyond the human imagination. Let's see the variety and beauty and health that are possible.

Please save our old-growth forests. Please.

One of our greatest assets to protect our air quality!

Old growth forests are a resource we can't afford to lose. Please see the changes to the proposed NOGA that I support. Thank you

Leave our forest alone!

Recent scientific research has shown that trees sequester 75% of the carbon after reaching full canopy height at an age of 50 years. To effectively use trees for carbon capture, it is implicit we protect mature trees from harvest.

Thanks for saving mature trees! They are invaluable!

Such priceless treasures! I urge you to do everything possible to preserve and enhance them. This is a Heritage which should outlive all of us.

Save ancient trees . They are the stock for our future after we learn to stop destroying everything in our sight for our immediate needs.

We absolutely have to save and help our forests to thrive in order just to live, let alone help ourselves to thrive. Act with sense!

I ask that you consider the legacy of old growth trees. No easy task in our world today to have survived so many obstacles to have lived this long. I ask that you protect them. Our children will thank you. Their children will thank you.

Please reconsider the amendment being proposed per OGF and mature forests' protection. The proposal does not go nearly far enough to meet the intent of the Biden administration to protect one of our greatest bulwarks against climate change's worst impacts that we have already in place. Compromising the extent of these forests with 'thinnings' and not provisioning for future forests to become mature and OGF seems very counter productive at the least. Natural forests do not need the intercession of the forest service to do what they are geared over millennia to do.

Dear United States Forest Service: Old Growth Forest is essential for all the reasons noted in the proposed amendment, but also for the every communities mental and physical health. Forests everywhere are collectively the lungs of the earth, and the storage bins of carbons. Careful research based care of our Old Growth Forest will feed into generational positive impact. Please keep our forests thriving! Cheryl Gooch

To successfully survive on this planet, we need to maintain our natural spaces. This is a great opportunity to do this.

It is the very least the government should do to protect our old growth forests.

I have learned that big old trees provide a lot more benefits than younger smaller trees. All native trees are good but big old ones are more so. We need to save them.

Whether we and our politicians know it or not, Nature is party to all our deals and decisions, and she has more votes, a longer memory, and a sterner sense of justice than we do. - Wendell Berry How do fires and floods speak to us!!!

Forests are critical to preserving us, the human race!!! We require biodiversity to survive, and we need trees to capture & store the vast amounts of carbon we're still emitting. This matters to me personally ~ I've planted more than 150 trees on the 5 acres of farmland my husband & I bought 32 years ago. Please save mature & old growth forests and leave the world a habitable place for our children, grandchildren, and descendants!!!

Please protect America's old growth forests! They are a national treasure that benefits all Americans! Thank you!

We need to protect our old growth forests.

When nature is respected and protected- All benefit and are protected.

**ACTION NOW!**

Why are we still fighting for things of value and worth that add to the longevity of our planet in this country; the most powerful country in this world? When will we awaken? When we have no choice in the matter? That time is

now. Save our old growth forests, cut oligarchs in search of the next penny down to size, instead.

Thank you !

So grievous to see trees destroyed. The Earth needs every one it can get.

We so often, in areas like ours, with so many beautiful trees, not recognize the value of our full grown, and old growth, trees. When I drive into new developments, or newer suburbs, that have a tiny tree in a sea of sunlight that can become sweltering in the summer, no fully grown trees to provide buffers from intense summer sun or strong cold winter winds, I imagine what their utility bills are due that paucity of trees. I see people in areas of many trees cutting down 20-50 years of growth to redo curbs and sidewalks and then planting new sticks to wait for them to grow. In Europe, I see trees in cities that have been there for hundreds of years! We MUST protect, value, OUR TREES!!!

Columbus is growing. People are needing and seeking the out of doors. To provide this experience and attract more people to our great forests we need to protect them. Thank you.

Everyone should be able to experience the magic of an old growth forest.

Ohio has been one the most deforested states, let's preserve, at the very least, what we have left

Father, Voter, Taxpayer, Outdoor Recreator, Wildlife and Wild Place Advocate, Public Land Owner. Protect these places for us please.

The US Forest Service has an obligation of species protection, just as the EPA does. Old growth forests are a treasure and any strategy to protect the little remaining must take into account renewal of the species, which are irreplaceable. The spotted owl has nothing on our ancient tree species. Both should be protected, but taking the latter for granted is a gigantic miscalculation. The human predators are out there, lobbying for that last valuable wood, highly profitable to a few, while the Many languish because of the canopy and ecosystem loss. The US Forest Service needs to be about protecting the Many, not the Few. And if it isn't, we will work for reform in the organization, to create a mission statement and a staff which WILL protect our national treasures for posterity, not in a museum, but in a vital ecosystem capable of reproduction AND expansion!

Old growth forest in Ohio is exceedingly rare. What remains of it should be protected from commercial logging. This will protect biodiversity, carbon sinks, and provide opportunities for research to better understand how old growth functions.

Logging should not be permitted in old growth forests. They are a limited supply

Please add more old growth forests under your protection. Those trees are nature's respiratory system protecting our climate. No logging, no fracking, no commercial activity should be permitted.

Riding along the Ohio River and its tributaries with Amtrak, I cherish the mature trees. Please protect them and expand protection of such trees everywhere.

It is essential to stop logging off old growth forests. Nonsense about resiliency will not do!

Public lands are held in trust for future generations, not to be used up by the current citizens.

The quickly growing body of research around the benefits and necessity of mature trees in our landscape should drive the choices we make for the future of Ohio and Ohioans. If forest resiliency is truly a goal, then use science and data to create policies and plans. Long-term economic benefits can be directly tied to healthy ecosystems. I urge Chief Moore and the 31,000+ Forest Service employees to consider what it means to 'sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.' A worthy mission that demands a long-view and an understanding that decisions made now will impact the health of our people and economy. Americans alive today and the future generations noted in your mission statement need to be your priority, not the just the logging industry.

Old growth forests are nature's best way to combat climate change, they act as carbon sinks. Ohio needs to preserve its remaining old growth and help promote increasing old growth forests in Ohio. One of Cleveland's monikers is Forest City. Let's bring back the forests to Cleveland and the rest of the state of Ohio.

Forest Service: I urge you to prohibit commercial logging of the old-growth forests under your care. Update the NOGA to include real, measurable mandates and targets for the recruitment of future old-growth forests.

I believe our human intelligence is a God-given gift for our well-being. As we learn more about forests, we must honor that gift by following where it leads. Certainly we need to act right now on what we're learning about the mycorrhizal fungal networks in old-growth white oak forests such as in the Wayne National Forest. What an amazing network we're just beginning to understand (or at least our family is just beginning to be aware of). Although we must be mindful of fire hazards of dry brush, we must not allow commercial logging in old-growth forests. Please honor what's best about humanity, use the knowledge we're gaining, build a better future.

The Old Growth Forest in Ohio is a testament to the resilience of our community. When Ohio was first settled, it was said that a squirrel could run along the treetops from Lake Erie to the Ohio River. That is a very impractical thing to say today, but saving the Old Growth Forests, and encouraging development of additional pockets of the same, will do a lot to maintain the quality of life in our state for a better climate, for biodiversity, outdoor recreation, and the economy. It will better connect the people of the state to Nature while creating more respect for the importance of Nature. We all can live very well with that.

Old growth forests are one of the great defenses against global warming. It would take decades or even centuries to regrow the trees we now have in those forests. As global warming increases, we must do all that is possible to protect these trees.

Please protect the oldest forests!! It is so quick to lose them. Please protect them for they cannot protect themselves. It is for us and the next generations! It is for the health of the planet.

Please, please prohibit logging in old-growth forests and while we're at it, let's prohibit drilling and extracting in and nearby protected forests.

Allowing unfettered freedom for forests to recover, and protecting them from all logging, will allow us to experience and enjoy a unique ecosystem few of us have had the privilege to experience. Leave nature alone - she knows what to do, and we need to live within boundaries that allow nature to flourish.

Old-growth forests are one of the best natural ways to slow climate change. The older the trees the more carbon dioxide they remove. We need them to help us survive.

A action that benefits the entire planet and life dwelling upon and with in.

Please prohibit logging in old-growth forests. We must preserve them for the sake of our future and biodiversity on earth.

Preserving old-growth forests are part of our nation's legacy not just to provide a space for families and future generations to appreciate and learn about the crucial role nature plays in our lives, but also a way to continue sequestering carbon and preventing the deleterious impact of a warming planet. To destroy a tree is to destroy the current and future lives of people in this only planet we have. I urge the US Forest Service to rethink the way they view the relationship between change and resilience and stewardship.

We need to preserve our nature forests to reduce carbon emissions and slow global warming. AND they are beautiful treasures if our planet!

Preserving and nurturing our old growth forests and newer forest is essential storing carbon and stopping the inexorable damage from global warming

Our old growth forests are treasures and deserve to be protected.

PROTECT OHIO!!!

I've lived in Ohio my entire life and its wild spaces are critical to my health. Old forests, especially, have a character that newer forests lack. We need them. The planet needs them. How hypocritical to lecture third world countries about protecting "the lungs of the world" and not do our part here in the states!

Old forest growth captures substantially more carbon than new forest growth. This should be a no brainer for anyone paying attention to climate issues and cares what the the next generation is inheriting. Do you believe in science?

The extractive philosophy is part of our history but it doesn't have to be our future. Green economies lead to better outcomes for society.

Goll Woods in Fulton county as well

Wayne National Forest is a special place and needs more protection. To allow fracking in it while trying to protect mature trees makes no sense. Why make more carbon when we should be reducing it? Our approach reminds me of the mindset of the Bureau of Reclamation and Corps of Engineers as outlined in Cadillac Desert. totally out of date with the times and a dinosaur that is trying to hand on.

Without trees, what would Ohio be?

Old-growth forests were established by God the Creator himself. Let's protect his wise work!

I am in favor of recognizing old growth forests in national forests especially since I live in Athens County, Ohio in conjunction with Wayne National Forest areas. I appreciate the main goal of the Forest Service is conservation, and I understand multi-use responsibilities. I am concerned about oil and gas (Fracking) and commercial logging operating without enough regulation or accountability to support sustainable forests. I believe WNF's oak management plan is misdirected. Encouraging a monoculture that is susceptible to fungal and insect induced diseases, especially oak leaf wilt. For humans the oak leaf mite is a growing concern. Sustainability is in jeopardy with increasing climate change. I use Wayne National Forest for walking, plant identification, and wildlife viewing. I use other national forests when traveling for camping in peaceful, beautiful areas.

Banning logging from old growth forests would be the smartest thing to do. We need to prioritize saving old

growth forests to help us in the battle against climate change. That is the most cost effective way to help us in our efforts to draw down carbon. Setting aside areas that could become old growth given time is also a cost effective solution.