Data Submitted (UTC 11): 8/24/2022 7:11:00 PM

First name: Marshall Last name: Osborne Organization:

Title:

Comments: As you know, protecting our mature and old-growth forests is at the "heart" of what we do. Now we have an opportunity to protect them at a national level.

On Earth Day President Biden issued an Executive order calling on the Forest Service and Bureau of Land Management to conserve mature and old-growth forests as a climate solution. This was a momentous step toward meaningful protections, but the Forest Service is trying to undermine the executive order by sidestepping its responsibility to put a moratorium on all logging of mature and old-growth forests. It's up to us to ensure that this executive order turns into real and lasting changes in how federal agencies manage older forests.

In response to the President's Executive Order, the federal agencies have opened an official public comment period to solicit feedback on how "to define, identify, and complete an inventory of old-growth and mature forests on Federal lands." It is critical that we demonstrate widespread, overwhelming public support for permanent protections, and we want Kentucky's voice to be loud and strong!

We are working with the Climate Forests Coalition toward the national goal of 100,000 comments submitted by the August 30 deadline. The most important goals of this campaign are to:

*Ensure that "mature" forests are defined in a manner that protects the majority of carbon, wildlife habitat, and watersheds on the landscape (we're using 80 years old as a benchmark for this). To us, the mature definition is more important than the definition of old-growth.

*Stress the need for a lasting rule that prohibits logging in mature and old-growth forests - it's not the focus of this federal register notice, but we're not sure how many public comment opportunities we'll get so we want to take advantage.

Please take action by submitting comments through the Forest Service's portal

Here are some sample comments that you are welcome to personalize:

Thank you for taking the next steps to advance President Biden's Executive Order. Protecting our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale.

For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older. By setting logging limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older forest elements provide for future generations. These older forests and big trees collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which have largely been lost to logging across the landscape.

President Biden's Earth Day Executive Order rightly recognized the critical role mature and old-growth forests play as a climate solution, and the urgent need to confront the threats forests face. If continued logging of these trees is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature & log-growth trees and forests to logging will only make the climate crisis worse: Scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires.

In Kentucky's Daniel Boone National Forest, there are an estimated 430,000 acres over 80 years old, comprising

about 60% of the forest. About 100,000 acres of mature and old-growth forests have been cut since 1980; making up about 15% of the Daniel Boone National Forest. We must preserve what we have left!

Protecting trees in the Daniel Boone National Forest over 80 years old will benefit the many species of conservation concern that depend on the mature and old-growth forests found here, such as:

- *Threatened and endangered Indiana, northern long-eared, and gray bats
- *Numerous species of birds that are suffering from habitat loss such as the Cerulean Warbler, Wood Thrush, and Red-headed woodpecker
- *Medicinal and culturally significant plants like ginseng and goldenseal

for cutting.

*The endemic Pine Mountain tigersnail, which is mostly associated with old growth In addition, the Daniel Boone National Forest is home to old-growth and culturally significant trees, such as the largest known Red Hickory tree, located in an old-growth forest in an area of the Redbird district that is marked

If the Biden administration is to do all it can - and must - to limit atmospheric carbon levels, and demonstrate international leadership, these protections must be made through binding regulations that will endure in future administrations. To ensure a rule can be adopted on the necessary urgent time frame, with the opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible that would prohibit logging in mature and old-growth forests and define them as 80 years and older.