

Data Submitted (UTC 11): 8/28/2022 12:29:15 PM

First name: Bethany

Last name: Marker

Organization:

Title:

Comments: Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As you know, 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. But time is running short: the climate and biodiversity crises are growing exponentially worse and it is critical that you fulfill the President's directive to provide lasting protections for these trees.

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 & old-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
- 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 for cutting.

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, much as the Clinton-era Roadless Rule has done. 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.

?

In summary, I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging.

Thank you for your time,
Bethany Marker