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Organization: Greater Louisville Sierra Club

Title: Chair

Comments: To: USFS

Subject: Comments regarding National Old- Growth Amendment

These comments and recommendations are being submitted on behalf of the nearly 2,000 members of the Greater Louisville KY Sierra Club. Thank you for your consideration.

The context for our comments: We know that mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water, and shelter wildlife. Logging them deprives us of the benefits and beauty of our largest, oldest trees. Cutting down old-growth trees to save them from potential threats is a false solution. They are worth more standing.

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of "proactive stewardship" goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth.

Thus, we recommend:

1. Stop Cutting: We ask that you immediately stop cutting old-growth in the Daniel Boone National Forest.
2. Old-Growth Management: Any management in old-growth forests, including prescribed fire and understory management, should be the minimum necessary to support existing and future old-growth structure and function as appropriate for the community type.
3. Eliminate Exceptions: Eliminate exceptions in the plan that allows forest managers discretion to convert old-growth to young forests or to otherwise degrade forests' old-growth condition.
4. Importance of Old-Growth: Recognize the importance of old-growth across all forest types, including disturbance-mediated forest communities like upland and fire-adapted oak forests and woodlands.
5. Identification and Inventory: Ensure that the inventory and identification of old-growth is scientifically sound. Make the process of identifying old-growth forests transparent, consistent, and open to public input. Involve researchers, ecologists, and other outside experts in the identification and inventory process.
6. Steward Mature Growth: Require that mature forests be managed for future old-growth in a manner that ensures a variety of patch sizes, wide distribution, and good connectivity across the Daniel Boone National Forest, improving on the deficiencies in the current forest plan.
7. Old-Growth Network: Develop a plan for a network of future old-growth forests through an open, participatory, and scientifically sound process.

We urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores many thousands of public comments the agency received on last summer's advance notice of proposed rulemaking.

Again, thank you for consideration of these comments and recommendations.

Steve Henry

Chair, Greater Louisville KY Sierra Club