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Comments: Comments submitted by Sierra Club, Kentucky Chapter

We ask that you immediately stop timber harvesting in the Daniel Boone National Forest and across the nation until agreement is reached on how to adequately identify and set aside mature and old growth stands.

Large stands of mature and old-growth forest are essential for carbon sequestration, reduction of loss due to fire, healthy headwater streams, maintaining biodiversity and wildlife habitat. Harvesting mature and old growth forests deprives our citizens and ecosystems of these services and benefits.

The Draft Environmental Impact Statement as written fails to adequately protect mature and old-growth stands. The draft also contains ambiguous language that could be used to circumvent protections of old growth.

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.

Recognize the importance of old-growth across all forest types, including disturbance-mediated forest communities like upland and fire-adapted oak forests and woodlands.

Develop a plan for a network of future old-growth forests through an open, participatory, and scientifically sound process.

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.

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.

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.

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 rule making.

Again, thank you for considering these comments and recommendations.

Terrell Holder

Chair, Sierra Club Kentucky Chapter