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Comments: Mature forests and trees need explicit protections. Mature forests provide the bulk of the climate benefits on federal forests and are vital for sustaining biodiversity and mitigating climate change. The country has lost most of its old-growth to over a century of logging.

Mature and old-growth forests help protect streams and water quality, limit non-native species invasions, and provide places of beauty for recreational, cultural, and spiritual endeavors. Prior to the widespread logging and land clearing that followed Euro-American settlement, most of Kentucky's forests existed within a spectrum of old-growth conditions. Meaningful protections are very much needed to ensure the protection of existing old growth, and to ensure that mature forests across the landscape are allowed to develop into functional old-growth over the coming decades.

Unfortunately, the current version of the Forest Service's proposal in the Draft Environmental Impact Statement fails to prohibit logging of old-growth. Despite great language about the importance of old-growth forests, the language includes a wide range of exceptions allowing for - even promoting - the logging of old-growth forests. Many of the same tools, tricks, and justifications currently used to log old growth in the Daniel Boone National Forest

would be permitted. Proactive planning for the recovery of old-growth, including for large and

small patches, connectivity, and a full suite of forest community types, would take a back seat to meeting the agency's ballooning timber targets, emphasis on intensive regeneration cuts, back-room deals with hunting organizations, and a general disinterest (and disdain) for old-growth.

PLEASE consider the following for Region-8 and the Daniel Boone National Forest:

1. Immediately stop cutting old-growth in the Daniel Boone National Forest.
2. 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 in the plan that allow forest managers discretion to convert old-growth to young forests, or to otherwise degrade or diminish forests' old-growth condition.

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

Our forests deserve to reach maturity. Please consider playing the long-game and change the perspective from "instant" management to a much longer-term model that not only protects what little old-growth we have left, but paves the way for our potential old-growth to have the chance to reach full maturity. The climate crisis is urging us to use the resources we already have available to us to combat the effects, we just have to choose to let these resources GROW!