

Dear Secretary Haaland and Secretary Vilsack

July 31, 2022

RE: EO 14072 Public Comment on Definition and Inventory of Mature and Old Growth Forests

First, I appreciate the urgency underlining the short timeline on the inventory and mapping of the remaining mature and old growth forests on our federal lands. Thank you for taking the next steps to advance Executive Order 14072. The value that mature forests play has been well documented and we continue to find out more and more about the role they play in carbon sequestration and habitat. They should be given much more protection than they have under current forest management practices and policies. Old growth trees should not be logged nor removed from the public land. Living, dead, standing, or fallen they hold carbon.

Coming to a definition that encompasses the variety of mature and old growth trees across the diverse landscapes is challenging. The simplest definition should be based on age, not diameter or health, or species. Therefore a definition of **80 years or older** would work best across the diverse lands under Federal management. Presence on the landscape of individual trees and stands of trees can be determined through non-invasive mapping analyses techniques, including LiDAR. There are already several inventories of US forests, and the mapping/inventory due by April 2023 can hopefully take advantage of available data.

In addition to protecting trees 80 years and older, we also need to allow for future mature trees to develop and ensure we have big, old, carbon-consuming trees in our future. This means we/you need to develop policies to protect and enhance mixed age/mixed species forests to provide resiliency and future old growth and mature forest ecosystems for generations to come. We also need to allow natural recovery of areas that have burned or had other disturbance as this contributes to biodiversity and resiliency. Here in Oregon where I live we have lost many old trees due to post-fire logging, past fire suppression leading to hotter more intense fire, and fire-fighting activities, such as cutting in new roads and over-zealous vegetation clearing. Old growth trees are survivors. Even if burned, they are holding carbon that will be released if logged and milled.

To inventory and map the remaining mature and old growth forest please include mapping of primary forests—forests that have never been logged—even if they have been subject to natural disturbance such as wildfire, windfall or disease. In addition, don't leave out relic old growth trees that may be within mixed forest stands. These areas are critical to sustaining genetic diversity and biodiversity.

It is critical to protect the remaining trees as quickly as possible. Rulemaking does not need to wait until after the inventory and mapping are completed. We know what needs to be protected and there is urgency to this. Please proceed with rulemaking and mapping and inventory work concurrently.

Thank you for the opportunity to provide my comments on this extremely critical work to protect our remaining mature and old growth forests.

Sincerely

P Farrell