

Data Submitted (UTC 11): 8/22/2022 4:00:00 AM

First name: Ed

Last name: Martin

Organization: Western Forest Products US

Title:

Comments: See attachment

Old Growth and Mature Forests (Executive order #14072) Comments.

Thank you for the opportunity to provide comments on Executive order #14072. It is sad that the federal agency must waste its precious resources on a mis-guided effort while our Federal Forests ecosystems continue to experience massive wildfires and other challenges, but alas such is the direction from the oval office. Here are our comments;

* It is an impossible and unscientific task to come up with a single definition of old growth that applies to many diverse forests and forest types across the United States. Any single definition of old-growth and mature forests could be so general that it's useless in guiding forest management across the nation, or so specific that it leaves out forests that some would consider mature. In no case, should the agencies adopt a definition based on arbitrary size, age, or diameter limits.

* Most lands managed by the federal government are already off-limits to logging or have restrictions that make active forest management infeasible.

* Well-meaning but misguided efforts to define old growth and mature trees will only lead to more arbitrary policies that limit the ability of federal agencies to treat overstocked, fire-prone forests and will lead to less old-growth on the landscape over time.

* The worst thing we could do during a climate crisis is to walk away from our public lands and decide not to use the tools available to help adapt these lands to changing conditions and reduce the risk of catastrophic wildfire.

* Wildfire, drought, insects and diseases, and the resulting high tree mortality have reduced the ability of federal lands to sequester and store carbon.

* This effort to "define and inventory" older forests undermines the Biden Administration's own 10-year wildfire strategy to significantly increase forest management treatments and diverts limited resources away from our national wildfire and smoke crisis.

* The USFS and BLM should focus on accelerating active forest management on federal lands to reduce the risks of severe wildfires and to improve our forests' resiliency to fire, insects and disease, and to adapt these landscapes to the impacts of climate change.

* Such treatments have helped public lands managers and firefighters save large, old and mature trees from destruction, including the iconic Giant Sequoias in California.

Edward Martin

Manager, Standing Timber & Log Procurement