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Comments: The intent of this order to protect forests to sequester carbon, is laudable, but its unintended consequences could do just the opposite. I am a private forestry consultant managing 12,500 acres in the carbon rich forest on the west side of Oregon. I have a masters of forestry and I have also worked for the State of Montana and the US Forest service. My masters in forestry was completely funded by a USDA National Needs grant to study disturbance ecology and climate change impacts in the mountain pine beetle outbreak in the high elevation whitebark pine forests of the greater Yellowstone ecosystem. For over a year I strategized and volunteered with 350pDx's Forest defense team dedicated to employing Oregon's forests to help combat climate change. Thus, I know that forests can and should be managed to sequester far more carbon than they currently do. One of the best, consensus solutions to do that in the Pacific Northwest is to extend rotation ages to the "biological rotation age" which in Douglas fir forests is about 80-years-old. In fact this is what my client is already doing, as we are a leader in this regard -see attached article.

Many in the climate and conservation community will advocate to define "mature" forests as those that reach biological rotation age, so 80 years old in the NW temperate rainforest timber basket. Rotation age implies harvest to start the rotation again. In light loving Douglas fir forest, a rotation starts with a heavy harvest, a clearcut with reserves or maybe a seed tree harvest. This means that on a small scale, that stand is not conserved, but on a large scale more forests -and carbon- are conserved because they are grown longer. This order mentions conserving mature forests multiple times, while at the same time endeavoring to "sustain jobs in the sustainable forest products sector[hellip].while supporting healthy, sustainably managed timber communities." Timber communities depend on the ability to harvest timber from both private and public forests. There is a great push, that I wholly support, for industrial timberlands to grow their timber longer, increasing from a measly 40 year industry standard to at least 50 years, but preferably 80 years. The crux of the problem is this if rotation ages were lengthened through incentives or carbon markets, in the decades that private landowners were growing their timber double what they had planned, the wood supply will drop precipitously crashing rural timber economies and closing mills so that not even thinning restoration work will be economically feasible.

Because logs are a globally traded commodity and there is leakage over political boundaries, closing mills here will create more demand for logs around the world. This will lead to more deforestation in areas with less legal restrictions and oversight on harvesting, precisely what Biden is attempting to additionally ameliorate in this order. For the carbon superstar PNW forests to inch towards their immense potential to be carbon sinks while at the same time creating sustainable wood products and healthy timber based communities, all landowners need to grow longer rotations. This means that the federal government needs to relieve the market pressure on private industrial lands, by cutting mature (80-100-year-old) year forests. I believe that no truly old growth forests should be cut unless the fire killed trees are being salvaged. Please remember and consider the economic devastation that The Northwest forest plan wrought on timber communities and reflect on how that would occur again if "mature" 80-year plus federal forests were conserved, and removed from harvest plans. While emotionally harder to cut bigger trees, it is what is needed for climate gains in Cascadia, and throughout America's timber regions.

ATTACHMENT: Yes Long Rotations Can Yield Real Climate Gains for Cascadia - Sightline Institute.pdf