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First name: Tonya

Last name: Enger

Organization:

Title:

Comments: Our western old growth forests are worth more standing. Forestry practices have not aligned with our current research. Climate scientists are practically screaming that leaving our oldest forests standing is the only way to reach our climate goals by 2100.

Law, et al. 2018 have found that: "reforestation, afforestation, lengthened harvest cycles on private lands, and restricting harvest on public lands increased net ecosystem carbon balance by 56% by 2100, with the latter two actions contributing the most.

Increasing forest carbon on public lands reduced emissions compared with storage in wood products because the residence time is more than twice that of wood products. Hence, temperate forests with high carbon densities and lower vulnerability to mortality have substantial potential for reducing forest sector emissions."

According to the Center for Sustainable Economy's Oregon Forest Carbon Technical Report:

"3. If allowed to mature, Pacific Northwest forests can capture and store more carbon per

acre than any other major forest type on the planet. Old growth forests in western

Oregon can store over 1,000 tons CO₂-e per acre.

The Intergovernmental Panel and Climate Change (IPCC) has produced carbon storage metrics

for 13 forest biomes within four global forest types: tropical, subtropical, temperate, and

boreal. Pacific Northwest forests are part of the cool temperate moist biome, which is the most

carbon rich biome on Earth with mean storage of 233 tons carbon per hectare (tC/ha).¹⁸ This

biome "default" value, however, includes both cutover and old growth lands and various forest

types. Old growth forests in the Pacific Northwest store far more. Forest carbon density in

Oregon's ancient forests has been found to top 1,000 tC/ha. "

Current carbon stocks are just a fraction of what existed in ancient forests that once dominated

the landscape, and modest storage improvements can have globally significant benefits

Study after study confirms that proforestation is the cheapest and easiest way to maximum carbon sequestration and ensure biodiversity targets.

Groundbreaking research from Moomaw, et. al 2019 find: "growing existing forests intact to their ecological potential-termed proforestation-is a more effective, immediate, and low-cost approach that could be mobilized across suitable forests of all types. Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty."

If we want to make GHG reduction targets by 2100 then leaving our oldest natural forests IN TACT is an absolute MUST.

Thank you for protecting our natural heritage and life on planet Earth.

ATTACHMENT:law-et-al-2018-land-use-strategies-to-mitigate-climate-change-in-carbon-dense-temperate-forests (1).pdf - Article: Land use strategies to mitigate climate change in carbon dense temperate forests

ATTACHMENT: Oregon-Forest-Carbon-Policy-Technical-Brief-1.pdf - Technical Brief: Oregon Forest Carbon Policy, Scientific and technical brief to guide legislative intervention, V1.0 12-11-17

ATTACHMENT: Restoring Natural Forests.pdf - Comment article: Regenerate natural forests to store carbon