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Comments: For the inventory of old growth, it might be helpful to include a category of forests and woodlands that have never been logged. There are millions of acres of unlogged and old growth pinyon-juniper, Jeffrey pine, bigcone Douglas-fir, blue oak, and post oak dominated woodlands, for example, in the central and western United States. These would often be considered 'non-commercial' timberlands and when found on steep or remote terrain, they are often dominated by mature and old growth forests, including some of the most ancient trees in the country. Predictive models, or habitat suitability models, could be devised quickly to identify, for example, pinyon-juniper on rocky remote terrain in the Great Basin, or other conifer woodlands on steep remote slopes in the arid West. There may not be the time or personnel to field test these predictions, but they are likely to be correct to a first approximation and will surely scale to the millions of acres of probable mature and old growth forests, thus helping address the executive order within the very limited time constraints. This might also give a measure of federal recognition to what are among the most extensive old growth forests left in the United States, the austere but unlogged conifer woodlands of semi-arid America.