

Data Submitted (UTC 11): 7/24/2022 12:00:00 AM

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Comments: As a researcher and writer on forest history, ecology, and management, and as a forest owner on the border of the George Washington National Forest - largest national forest in the East - I know that the maturing forests on the GWNF are exactly the stage and age that scientists around the world are saying we need against climate change. These 80-120+ year old forests of oak-hickory species can live for 400-800 centuries, as documented by the tree rings of logs cut in the massive deforestation of 1880-1930. This is pretty much the case in all six million+ acres of the Southern Appalachian national forests, most of which are on steep slopes and high ridges that should never have been cut in the first place. Please base your definitions on trees that are ready and willing to sequester massive amounts of carbon, address the biodiversity crisis by providing habitat, keep headwater streams clean, and provide clean air to many millions of people.

In summary, I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as no older than 80, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.