

Data Submitted (UTC 11): 8/2/2022 12:00:00 AM

First name: Ned

Last name: Milligan

Organization:

Title:

Comments: Thank you for taking the next steps to advance President Bidens Executive Order (Strengthening the Nation's Forests, Communities, and Local Economies) to fulfill the Presidents directive to provide lasting protection for these trees, and to make progress toward the Presidents goal to protect 30% of lands by the year 2030. As you know, conserving our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. Moreover, we know that the climate and biodiversity crises are growing exponentially worse, and we are running out of time to act.

Mature and old-growth forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests today will provide the foundation for recovering old-growth ecosystems for the future. We are already seeing the impacts of a warming climate and it is critically important to create a meaningful rule that can be easily implemented across the landscape to protect the most high-value climate forests. For these reasons, please consider mature trees to be defined as no less than 80 years old.

President Bidens Earth Day Executive Order rightly recognized the essential role mature and old-growth forests play as a climate solution, and the urgent need to confront the threats these forests face - including from logging. Please work swiftly to create a strong, lasting rule across federal public lands that protect existing mature and old-growth trees and forests and allows the recovery of forests that have been lost. Now more than ever, our climate forests are worth more standing.