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Comments: Biden's Executive Order presents the Forest Service a remarkable opportunity to create a profoundly different future for our priceless national forests. Do not let this moment pass without a bold, progressive solution. When western national forests were created out of the federal estate, most forests were in a mature and old growth (MOG) condition. Conversely, eastern national forests had been largely plundered but have now recovered remarkably to become largely mature. The agency's "big logging era" (c 1960-1990) removed much of the commercial value of these timber lands, yet about 50 percent of our national forests remain in Wilderness and Roadless Area, and thus remain protected from commercial logging, which is now the greatest threat to MOG remnants. If the Forest Service is to make good on the promise and potential of ecosystem management principles, now is the time to optimize forest carbon to meaningfully contribute to climate change solutions, while benefiting numerous other forest values. Forest carbon has become, arguably, the most valuable resource of the national forest estate. Protecting MOG is low hanging fruit, costing little or nothing. As you proceed to define and inventory MOG, I plead with you to keep it simple. Obviously, many forest types spread across a vast landscape could yield highly complex and confounding products. Do not go down that rabbit hole! Let me illustrate using humans. Our society has chosen to define "mature" and "old" humans using age - 18 or 21, and 65 - respectively. We do this in spite of the incredible variety in individuals or groups. These age thresholds serve as reasonable and easily understood approximations of what it means to be mature or old. Similarly, using the agency's own Northwest Forest Plan as precedent, I suggest selecting 80 year old trees and stands as the mature threshold; nothing greater. Using the precautionary principle, it is preferable to be conservative. Research shows that once trees and forests reach 80 years, they achieve remarkable capacity to capture and store carbon. Thus, the Executive Order intends to use federal MOG forests to help combat climate change. Keeping carbon storing capacity intact is essential to the cause. Using this simple 80 year metric makes sense. It is easy to understand for the professional and layman alike, and is readily applicable in the field. The 80 year standard is also dynamic, making allowance for ingrowth, as younger trees and stands mature in future years. While no approach will be perfect, the 80 year standard effectively meets the letter and spirit of the Executive Order. Mapping may be developed to provide a broad understanding of the extent of MOG, but mapping is only illustrative - not dispositive - as to whether a particular tree or stand is MOG in character. Mapping technology does not exist at such detail to be of use in the field, although gross mapping and analysis is helpful in describing overall policy effects at a national scale. As mature trees and forests age into old growth character, precisely when the transition occurs is moot, so long as agency policy for all MOG is consistent and seamless. Thus, it behooves you to craft one simple policy that serves to retain MOG in the forest, covering all trees and forests greater than 80 years old. Private forest industry has already pivoted, by and large, to a second growth, small tree economy. The Forest Service can do the same, relying on trees less than 80 years old for commercial logging. As Deputy Chief NFS, I was deeply involved in promulgation of the Roadless Area Conservation Rule (2001), and I think it's instructive to revisit that effort for guidance. The Roadless Rule was national in scope and dealt with a decades-long controversy. A robust NEPA and public participation process resulted in timely completion of the rule, which withstood numerous legal challenges and has proved to be defensible and durable. Yet the rule was a mere 2 pages long, and set forth only 2 basic prohibitions in inventoried roadless areas: commercial logging and new road construction. The Forest Service should pursue a similar simple, straightforward, common sense approach for MOG.