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Comments: Thanks you the opportunity to comment on this exciting step to utilize the amazing capacity of forests to sequester carbon and help in our existential fight to mitigate the impacts of climate change, in addition to all the other ecosystem services intact forests provide. As you note, defining old-growth can be challenging, but mature trees, structural diversity/layers, snags, & large woody debris are all common elements. While planting billions of trees is laudable and will help, keeping the mature forests that add so much carbon in the ground in the first place is more immediate and cost-effective. Since time is running short (the climate and biodiversity crises are accelerating beyond predicted models), providing lasting protection for these legacy forests as the President directive implies is essential.

While classic Doug-fir/hemlock old growth in my region is often measure in centuries, intense harvest pressure means there is very little forest left of that age and that has driven many old-growth dependent species to the brink. But there is a lot of mature forest of 80-100 years that is rapidly putting on girth, sequestering carbon, and providing water/air quality and soil health benefits for forest fauna and flora. Using 80 years assures continued ecological and carbon benefits and these forests can grow into the nearly gone old-growth, helping those endangered communities and helping human communities with water supplies and absorption/reduced erosion in the face of flooding events and intense rainfall. they provide for future generations. These 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.

Losing more mature & old-growth forests to logging will only make the climate crisis worse: Scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires. Research shows logging, not wildfire, drought, or pests, is the greatest threat to our mature forests despite plenty of logging industry PR that claims otherwise.

A recent USDA Secretarial Memorandum stated that "A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion." This statement represents an alarmingly inaccurate assessment of threats to mature and old-growth forests. Numerous wildfires in areas where "restoration", "hazardous fuels reduction" and "wildfire mitigation" occurred underscore this point. Protecting 80-year old and older forests can be done in a way for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations. Putting the emphasis on defensible space and Fire Wise efforts around at-risk communities is a more sound investment. There is a lot of independent scientific literature underscoring these points.

To limit atmospheric carbon levels, and demonstrate international leadership, these protections must be made through binding regulations that will endure in future administrations. To ensure a rule can be adopted on the necessary urgent time frame, with ample opportunity for public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

I wish these steps had been taken decades ago when President Carter first put on his sweater and addressed the nation in the early 1970s, but we must grab this chance to take some meaningful mitigation action that will have myriad benefits beyond carbon sequestration. So I urge the US Department of Agriculture and US Department of Interior to work together to initiate ASAP rulemaking based on a definition of mature forests and

trees of 80 years, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.