

Data Submitted (UTC 11): 8/13/2022 1:58:52 PM

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Comments: An immediate moratorium on logging within federal lands is needed while the provisions of this executive order are being implemented. The definition and inventory of old growth forest which are to be developed over the next year are critically needed to ensure that the limited amount of old growth forest currently remaining is not further diminished during the time period needed for a preservation plan to be developed.

Developing an unambiguous and comprehensive definition that will capture the full range of variability exhibited by mature and old growth forests across the nation is an important step in the long-term and this needs to be done carefully. The fact that no universally accepted definition currently exists, despite extensive research efforts over many years, is evidence that old growth is difficult to define. For the purposes of this executive order, which is to exploit the old growth forest as a global carbon-sink and a nature-based strategy for combatting climate change, any definition chosen needs to be broad in scope and all-inclusive. If we err, we must err on the side of protecting more forest rather than less forest.

Recognizing at the outset that this resource is irreplaceable and needs to be preserved in its entirety, that none of the remaining old growth forest can be spared, there needs to be an immediate moratorium on all logging within federally managed forest lands until such time as a definition and an inventory of old growth has been developed, reviewed by the scientific community and stakeholders and finalized through the environmental review and public comment process.