Data Submitted (UTC 11): 8/19/2022 12:19:40 AM First name: Paul Last name: Howard Organization: Title: Comments: Dear Secretary Vilsack and Secretary Haaland,

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The message below has been pre-written but I agree with it's content. As a bow-hunter, backpacker and hiker who returns to the same places annually but also goes to new places once in awhile, I have seen directly climate related changes over the past 40 years. What changes? - massive reduction of snow fields and glaciers, snow depths, water levels in creeks and rivers and ponds and lakes, more brushy undergrowth due to more CO2 and fire suppression, more insect carried tree diseases since winter nights don't get cold enough to suppress insects or the fungi they carry, and of course, increased wildfires due to hotter temps, higher winds and history of fire-suppression.

One of the best ways to have more fire resistance is to allow trees to attain "old growth" size since they become more fire-resistant, also taller canopies produce more shade to provide cooler ground and air temps and suppress as much brushy undergrowth. Then there's the obvious, more trees suck in more CO2 and hold it there if allowed to stand, and bigger trees = more sequestered CO2 = less warming effects in addition to the shade of a taller canopy of older bigger trees.

Considering how much "old growth" forests there "was" in the past that no longer exists and what does exist is a small fraction of what was, I cannot see any valid reason why we in the USA or anywhere on the planet should lose any more of it, if anything we need to reverse that trend and stop chipping away at the "old growth" areas that still remain.

As a Vet of 8 years of the USAF/AFNG and USN, I want to see my country, the USA, be a LOT smarter about the outdoors, wilderness, wildlife, ecosystems, and stop allowing big industry to keep trashing everything for short term profits to a limited few - it's not worth it and it's just plain stupid and shortsighted. Lets start doing things better because the course we're on with global warming (which is real and Not a hoax, and We're driving it) and the Human Overpopulation Problem driving a lot of problems (and solving nothing) are completely the wrong direction.

Thanks - Paul Howard, Corvallis, Oregon.

Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Protecting the remaining mature and old-growth forests and trees is one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. Communities throughout the Pacific Northwest (PNW) are threatened by climate-driven wildfires. By protecting our oldest, biggest trees that are most resistant to wildfire, we are also ensuring community safety and protection. It is critical that you fulfill the President's directive to provide lasting protections for these trees.

While EO 14072 correctly enumerates the many threats that climate change-enhanced drought and disturbances pose to mature and old-growth forests, it erroneously fails to include on-going logging as a threat to older federal forests and trees. There are numerous logging projects across the PNW that target mature and old-growth trees that underscore this point. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. If continued logging of these trees is allowed, the vital role they play in the fight against climate change will be eliminated.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees 80

years old. Many forests in the Pacific Northwest are fire prone, and wildfire potential will increase with climate change. However, several studies over the past decade have found that older forests are more fire resilient than younger, second growth forests. Using an 80 year definition framework as a benchmark would capture the most fire resistant trees and carbon storing forests. Land management can be directed toward protecting homes and communities from wildfire and forest resiliency projects that help safeguard older forests. Exceptions for logging trees over 80 years must be scientifically defensible, while protecting biodiversity values and encouraging management that restores older forest character.

A broad definition of mature and old-growth will also help ensure the restoration of mature and old-growth forest ecosystems in the Pacific Northwest. Such an approach will better ensure that there is enough redundancy in the definition of mature and old-forest to allow for natural disturbances and subsequent losses over time under climate change.

Old-growth forests of the Pacific Northwest are some of the best in the world for carbon storage and sequestration. The older trees in our nation's forests are climate champions-absorbing and storing carbon for centuries, and helping slow down climate change. Old forests with fire resistant trees can also help buffer communities from extreme wildfires. The Biden administration must do everything it can to ensure lasting protections for our remaining mature and old-growth forests.

In summary, we urge the USDA and DOI to work together to create durable policies 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.