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Comments: 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.