

Data Submitted (UTC 11): 8/24/2022 4:08:25 PM

First name: Valeriya

Last name: Efimova

Organization:

Title:

Comments: [External Email]Define and Protect Mature and Old-Growth Forests

[External Email]

If this message comes from an unexpected sender or references a vague/unexpected topic;

Use caution before clicking links or opening attachments.

Please send any concerns or suspicious messages to: Spam.Abuse@usda.gov

Dear Roy Barbour,

I support the efforts to define mature and old-growth trees and forests (MOG) and to map their locations. This action is necessary to implement President Biden's Executive Order to protect our life-giving forests, which serve as the most effective natural climate solution. We urge you to work with scientists who have already developed nation-wide inventories so that the timing and costs saved can go towards safeguarding rather than removing forests on public lands.

For the definition of mature, I suggest using trees 80 years old as a starting reference. This is when old-growth characteristics begin to develop, like thick fire-resistant bark. Because logging has and still is creating a devastating deficiency of older forests, younger forests must be allowed to grow to attain more carbon storage and sequestration. The inventory should recognize logging as a primary threat to our older forests.

Importantly, the inventory should recognize the role of mature and old-growth trees that have succumbed to ecological disturbances, such as fire, insects or disease. Post-disturbance logging is a principal threat to the entire seral development of MOG. When trees die, they become the building blocks - biological legacies - for forests to replenish and soils to further develop.

Our forests are worth more standing. The Temperate Rainforests of the Pacific Northwest, primarily consisting of national forests, are our nation's heritage. While all regions with MOG are critical to effective climate-forest policy, some regions stand out as globally significant, like the Klamath-Siskiyou. Despite the recent Executive Order, the Forest Service and BLM continue to target older forests for removal, including the Bear Country and River Complex timber sales on the Klamath National Forest.

Protecting mature and old-growth trees, live and dead, is the most effective natural climate solution we have. Please err on the side of caution in the definition of older forests and recognize logging as a main threat. To survive the climate and biodiversity emergency we must act quickly. Thank you for your consideration.

Sincerely,

Valeriya Efimova

563 Jersey Ave Apt 3L

Jersey City, NJ 07302