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Comments: Thank you for the opportunity to provide feedback to Executive Order 14072 (EO) especially regarding the Inventory and Definition of Old Growth and Mature Forests and a policy focus on Restoring and Conserving the Nation's Forests. My professional background includes over 50 years of forest management, reforestation, and wildland fire management in the western states and Southeast. Defining and inventorying the nation's mature and old-growth forests is not a new activity. It has been a key professional program for decades and has resulted in definitions throughout the National Forest system and other lands that are appropriate for different regions, ecosystems, and historical development. All efforts under this part of the EO should build on our long track record of definitions and inventory rather than diverting resources from ongoing programs to restore forests and mitigate fire effects. At the same time, I would hope that a focus on inventorying forest conditions will also ask some important national level questions about just how much forest we need to provide the various federal land benefits. The EO recognizes that we are at a critical juncture in addressing climate change and it may be necessary to adjust our priorities on how land is used and science-based management priorities.

As the EO recognizes, the nation's forests play a key role in "retaining and enhancing" carbon (C) storage. Understanding carbon dynamics in forests is instrumental to optimizing their role in carbon storage. By definition, old and mature forests represent major C storage entities, but they are generally in a neutral C condition, emitting as much carbon as they sequester, through mortality and decay. Only in young and maturing forests is C sequestered faster than it is emitted. In all forest types, it is important to recognize that all the stored C, in leaves or old wood, has been cycling through those natural systems for eons. They are not new additions to the atmosphere as occurs with burning fossil fuels.

Ideally, then, the optimum C mitigation using forests would be to turn all forests into young and maturing forests until they reach maturity (neutral carbon exchange), then use solid wood products from harvested trees to store the sequestered carbon and start the cycle over again. Of course, we recognize that other values such as retaining old growth in Wilderness and Roadless Areas must still be considered and will play into forest management plans, but the ideal C mitigation with forests argues for harvesting mature trees and dead trees after wildfires for solid wood carbon storage and for intensive science-based reforestation as soon as possible after harvest. The focus on widespread, intensive, science-based reforestation may well be the most important component of the EO for increasing carbon sequestration. Increased use of fuel reduction and prescribed fire will be equally important for wildfire mitigation.