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Comments: 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 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.

Stop replacing these old growth mature forests with plantations that do nothing to curb climate change and are prone to fires. Forests do not become a carbon sink until they are mature. We must save what is left of old grow forests.