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First name: Douglas

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Organization:

Title:

Comments: Dear USDA and USFS:

I am an independent writer, researcher, and citizen scientist. The primary focus of my work and research are ecological restoration and climate change mitigation. In recent years, much of my research has been focused specifically on the forest network, mycorrhizal symbiosis, and mature-and-old-growth forests. I've had the privilege of collaborating-with and learning-from many credentialed research scientists and ecologists over the course of my work including forest experts Merlin Sheldrake, Ph.D., Dominick DellaSala, Ph.D., Suzanne Simard, Ph.D., Robin Wall Kimmerer, Ph.D., and Michael J. Hathaway, Ph.D. Over the past two years I have been working on my own field experiments studying fungal decomposition, water retention, and soil regeneration in an actively recovering, post-harvest forest ecosystem.

It is my opinion, as well as the opinion of credentialed experts in the forest ecology field, that the reference condition for mature forest should be a forest of greater-than-or-equal to 80 years of age-dead or alive. That includes burned forests containing standing-dead trees 80 years of age or older. It is vital to the forest's recovery that the nutrients and biomass contained within dead trees and/or fallen trees be allowed to return to the forest floor so the forest's natural lifecycle can continue without being stunted by human industry. It is also vital to climate change mitigation that we not harvest standing-dead mature growth, as standing-dead trees are active carbon-storage units. Furthermore, the environmental cost of logging's fuel consumption and soil disruption along with the wood-product industry's emissions are directly detrimental to President Biden's EO 14072 climate change mitigation goals.

I also feel it is necessary to for EO 14072 to specifically name logging as the top stressor and threat to mature and old growth forests. Without that acknowledgement, the order omits essential and fundamental information for shaping future policy. Namely, that it is our logging and wood-product industries that have been directly responsible for the degradation and elimination of mature and old growth forest ecosystems.

The most efficient way to allow our mature and old growth ecosystems to mitigate climate change and help us to achieve the goals stated in EO 14072 is to leave mature growth forests, 80 years of age or older, intact and undisturbed by human industry.

Sincerely,

Douglas Balmain