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Comments: Our older and maturing forests on federal lands capture and store vast amounts of carbon dioxide and they left standing, should be a cornerstone of U.S. climate policy. Left to evolve and continue to grow, these federal forested lands, provide a natural "free" reduction in GHG emissions, help to filter our air/water, and provide many other ecosystem services, like keeping our air temperatures down and preventing stormwater runoff. But time is running short: the climate and biodiversity crises are growing exponentially worse, and it is critical that you fulfill the President's directive to provide lasting protection for these trees.

For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older. By setting logging exclusions using this definition federal agencies will establish a safety net that assures minimum protections of the ecological and carbon benefits these older and maturing forest elements provide for future generations.

The old dogma of logging by the U.S. Forest Service and the Bureau of Land Management on our public lands sets us backward in the fight against climate change.

The USDA needs to develop incentives for other alternatives to the hardwood/timber industry and look to more sustainable choices like hemp and bamboo to address our "wood" demand. It is our recommendation that we look to protect our forested public lands of maturing trees 80 years and older to effectively address climate change now.

Sincerely,

Silvia Solaun

Executive Director