

Data Submitted (UTC 11): 8/30/2022 4:49:56 PM

First name: Daniel

Last name: Raleigh

Organization:

Title:

Comments: I am writing as a scientist in strong support of President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. The science is clear that old-growth and mature forests and trees are one of the most effective and one of the most cost-effective climate mitigation policies. These older forests and big trees collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. I strongly urge the agency to define mature trees as 80 years and older and to protect these from logging. These forests are also the most resistant to fire. Such a rule can be structured to easily leave room for appropriate risk reduction of wildfire (which are well documented to be largely driven by small trees and brush, not mature fire-resistant trees)

The President's Executive Order rightly recognizes the very significant role played by old-growth and mature forests in controlling and reducing climate change. These forests are also the most resistant to fire.

Unfortunately there are an numerous examples of logging projects approved by the Forest Service that target mature and old-growth trees, including projects: often using disingenuous names "restoration", "hazardous fuels reduction" and "wildfire mitigation," The threat of logging mature and old-growth federal forests is extremely pressing, and it is within the agencies power to address this issue.

In summary, I urge the US Department of Agriculture and US Department of Interior to work together to initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, in order to permanently end the avoidable loss of their critically important carbon sequestration capacity, and to protect their water and wildlife values from logging.

Dr Raleigh, PhD