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Comments: Comment on Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies.

I've lived for over 60 years in Oregon and logging is in my family background.

We need to take care of the remaining old-growth by protecting it from logging for the sake of the forests, the climate, and sustaining rural communities.

Executive Order 14072 asks to identify forests at risk, but inventories have already been developed by private researchers using high-resolution mapping along with Forest Inventory Analysis (FIA). The definition of Mature and Old Growth Areas can be simplified overall to an 80-year age. Forests at this age are developing old growth characteristics such as downed and dead trees, more complex mycorrhizae soil systems and others depending on specific forest characteristics. Old-growth contributes to slowing streamflows and retaining moisture.

The federal MOG inventory needs to fully recognize widespread logging as both the major cause of the severe lack of old-growth forests and the ongoing depletion of old-growth forest. Acknowledgment of the impact of logging is completely missing from the EO and the subsequent Secretarial memo. The loss of old-growth forests and large trees, in turn, is contributing to the global and biodiversity crises that the president called out in his Executive Order.

National rules need to be proposed alongside the inventory to fully protect all Federal Mature and Old Growth forests (MOG). To be effective and provide international leadership, these protections must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done. To ensure a rule can be adopted quickly, with the opportunity for public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

I request that the Biden administration make a statement prior to the COP27 on how the MOG inventory process and a national rulemaking process to protect MOG from logging is a natural climate solution that will also achieve 30% protection by 2030 (Exec. Order 14008).

I request that the MOG assessment and national rulemaking promote enforceable actions that directly addresses the accelerating climate and biodiversity crises contributed by logging and related land uses.

In summary, please set the reference standard for mature forests/trees to those over 80 years nationwide. Forests at this age begin to exhibit a subset of old growth characteristics necessary to begin the recovery of depleted old-growth forests. The focus on protecting mature forests at this general age when old growth features emerge, results in the best protection of current carbon stocks, the rebuilding of biodiversity, and improved quality and quantity of drinking water sources.

Thank you,
Martha West