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Comments: The best way to mitigate the existential threats of climate change and the biodiversity crisis, in addition to the increasing water crisis, is to stop cutting mature and old growth forests and allow them to grow old, and to increase their size and prevalence. Public lands should not be cut, logged, changed and should be allowed to exist in their natural state. There is no better carbon sequestration and storage than a fully functional true natural old growth forest, with only natural disturbances and no logging at all. The highest levels of carbon sequestration and the highest levels of carbon storage are found in old growth forests. Young forests, early successional forests, are a source of carbon emissions for 15 to 20 years. They are only habitat for popular bird and game species that are not only unthreatened, but also very common, such as raccoon, rabbit, skunk and so overpopulated that they are creating problems with forest regeneration and native plant restorations. Mature and Old Growth Forest is the most resilient, and if existing connectivity is maintained, and better yet, more is restored, it is also the best for resilience of maintaining species diversity in the face of the amount of climate change that is inevitable at this point (due to our previous inaction.) Additionally, mature and old growth forests support an immensely higher level of biodiversity overall, with many species only moving into the forest after a century or more. So many of our endangered and threatened species are those whose habitat is interior old growth forest, and letting those forests recover, letting them become old, will increase habitat for many of the endangered species, allowing their populations a chance at recovery. Healthy mature and old growth forests clean water and regenerate aquifers, support perennial streams and entire watersheds, create and support clean, cold, aquatic habitat, supporting so many species, including supporting the ecosystem services that support our own species. Forests are vital to our well-being, and our old forests need to be protected and increased in size and number and location. There should be a moratorium on cutting any public forest at all. Some people are advocating for no cutting of any public forest over the age of 80 years. If we want to preserve as much of the climate and existing biodiversity as we can, we will stop cutting as much as possible. The amount of old forest is miniscule compared to what was on this continent (and others) before the climate began changing. Essentially, we have been removing the carbon scrubbers of Earth, on this continent and others. This is a major reason for our problem. The old growth forests of North America are as important as the rainforests of other continents, To allow the remaining forest to live and continue cleaning and storing carbon, to allow those on their way to getting old to recover, will be a major contributor to the solution. They will, for free, remove carbon from our atmosphere, store it, be home to myriad species endangered and threatened, increase biodiversity as they age, and support our hydrological cycle, and our water supply. Please do all that you can to allow old forests to continue, to recover, and to be the integral and critical part of our habitat that they are.

In response to the executive order, the Department of Agriculture and the Department of Interior have opened this official public comment period to solicit feedback on how "to define, identify, and complete an inventory of old-growth and mature forests on Federal lands." I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging. 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 limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older forest elements provide for future generations. 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. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which have largely been lost to logging across the landscape.

Thank you,

Cheryl Joy Lipton, Ecologist, Chester, VT