Data Submitted (UTC 11): 1/24/2024 6:30:31 PM First name: Ray Last name: Hicks Organization:

Title:

Comments: I am commenting in response to the increased preservation of old growth and mature forests, the stated purpose being mitigation of climate change. My response is based on my 40-year academic career in forestry and forest ecology. There are many reasons to preserve old growth forests but carbon sequestration is not among them. Younger forests are much more efficient at capturing and storing CO2, and if such forests are harvested and the wood used for durable applications, the carbon will be sequestered for many years. Old growth forests reach a steady state with respect to carbon intake and storage. Growth and accumulation of carbon at some point equals carbon release from decomposition. In addition, preserved old growth forests are not used to make durable wood products so any catastrophic event such as forest fire could release all the carbon dioxide back into the atmosphere. Using climate change as a justification undermines your case.