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Comments: The proposed amendment is a much-needed step in the right direction, but falls far short of sufficiently protecting old-growth and mature forests completely! The proposal should include more protections for mature growth forests. Furthermore, troublesome language in the proposal allows agencies to still log old growth for various ecological exceptions. Both of these insufficiencies must be corrected within the proposed amendment. Instead we must ensure we practice "Proforestation" (leaving older and middle-aged forests intact because of their superior carbon-sequestration abilities).

Consider these numbers:

-- Stands of century-old forest now account for only 7% of forest cover in the United States [Source 2]

-- 90% of virgin forests that once covered much of the lower 48 states have been cleared away. In the Pacific Northwest about 80% of this forestland is slated for logging. [Source 2]

Now consider the above numbers keeping in mind the Biden administration's 30x30 target conservation goal:

We must protect all of our mature forests as we already fall far below the 30% protected goal for both old-growth and mature growth forest, if you take into account the annihilation of these forests over the past few centuries - even over just the past century alone. The fastest, easiest, most efficient route to achieve a restored old-growth forest (which will take beyond our individual lifetimes) is to include full protection to all remaining mature growth forest. We cannot base our 30% protection goal upon just our current extent of decimated old-growth and mature growth forest - because old-growth and mature growth forests are crucial to a healthy, or even just a livable, planet.

The following numbers are only significant as they are a preliminary/initial estimate of what exists now on FS+BLM lands so that we have a baseline to help ensure that we do not have any further decline in acres:

-- 32 million acres of old growth = 18% of FS+BLM lands (per initial 2023 estimate) [Source 1]

-- 80 million acres of mature forest = 45% of FS+BLM lands (per initial 2023 estimate) [Source 1]

Furthermore, we must have more firm/accurate estimates completed to verify that we don't lose additional acres in the future and to ensure that we work toward the eventual long-term goal of restoring old-growth forest cover back to 30% of it's original cover.

REASONS to Protect All Mature Forests:

-- Far superior carbon-sequestration abilities and significantly more profound effect on slowing global warming. [Source 3]

-- Young freshly planted forests of young trees are far inferior in sequestering CO2 than older forests. [Source 3]

-- Newly planted trees take two or three decades to grow large enough to store much carbon. [Source 3]

-- The most disturbed numbers in the world are in the United States, not Amazon and Indonesia...The loss of

forest canopy is the worse in the Southeastern United States than in any other place on the planet. [Source 3]

-- The most biodiversity-rich region in North America is Southeastern U.S., with more species of animals and plants than anyplace else, is an ongoing tragedy in which the wetland, hardwood forests are being decimated for pellets to be shipped overseas. Companies falsely claim they are only residuals (branches, etc), but are converting whole trees into pellets, as documented by Dogwood Alliance. [Source 3]

--The forests in the range of 70-125 years are the ones that are going to add the most carbon in the coming decades...and unfortunately, 70-years (for many species) is the perfect size for the sawmill - which means these crucial trees are at great risk. [Source 3]

-- Except for the designated federal wilderness areas in national forests, the rest of our forests are almost all devoted to timber production, with roadless areas now at risk as well. [Source 3]

-- Wood pellet plants have been built -- and continue to be built - in low-income African American communities, resulting in asthma rates in those communities being five times the asthma rate elsewhere in the same state (of North Carolina). The cause is due to the plants producing a tremendous amount of dust and particulate matter. [Source 3]

-- Protecting older (mature) forests (if we get to net-zero emissions by 2050, and if we continue to reduce our emissions after that, and if we continue to increase the biological sequestration/nature-based solutions: we would start reducing the amount of CO<sub>2</sub> in the atmosphere by 2050 and 2100. The more we can increase the sequestration rate and the faster we can reduce the emissions, the better off we'll be (But cutting trees to burn them is not a way to get there). [Source 3]

-- Environmental Protection should be our highest priority. Humanity's survival is dependent upon a thriving and healthy, properly balanced and functioning environment. While such elements are easy to maintain, they are extremely difficult and expensive and sometimes simply impossible for humans to effectively replace or duplicate or replicate.

-- Forests act as a natural water treatment network, catching rainfall and regulating storm runoff. They also help keep our air clean by absorbing pollutants and releasing oxygen.

-- Mature forests are biodiversity strongholds, providing a home for thousands of plant and animal species, including threatened and endangered species. Negatively impacting these has unforeseen but wide-ranging devastating effects.

-- Mature forests provide essential wildlife habitat and refuge.

-- Mature growth forests contribute to outdoor recreation economy which improves mental and physical health and well-being of Americans. Doctors are even prescribing that patients spend time in such natural environments to improve their mental and physical health. Some even prescribe free passes to national parks! These include the National ParkRx Initiative and the ParkRx America organization. Prescriptions also include "Green exercise" and Forest Bathing ("shinrin-yoku") - and there is a growing field of ANFT Certified Nature and Forest Therapy Guides as well. The physical benefits associated with nature include: reduced stress; boosted immune defense; anti-cancer effects; increased energy; improved sleep; lowered blood pressure; reduced inflammation; reduced risk of obesity; accelerated recovery from surgery. [Source 5]

--Mature growth forests create a cooler environment and help to regulate the weather.

## OTHER CONSIDERATIONS in Protecting Mature Forests:

- Former anti-environment U.S.EPA administrator Scott Pruitt made a declaration and U.S. Senator Susan Collins made an amendment BASED ON INCCORRECT CLAIM/ASSESSMENT which now requires that all federal agencies must consider all forest bioenergy from sustainably managed forests to be carbon-neutral, in spite of the correspondence from scientists which state that this egregious claim/assessment is wrong - that in fact such forest bioenergy is NOT carbon-neutral. [Source 3]
- We must recognize and acknowledge and react accordingly - to make a distinction between industrial production forests and natural forests; we must make clear that natural forests are to be managed for biodiversity and the full ecosystem services that forests provide. [Source 3]
- We must apply protections to state forests as well as federal forests: In Connecticut, for example, where every single acre of state forest is at risk to being cut down! [Source 3]
- Another example of why must apply protections to state forests as well as federal forests: is in Massachusetts in which the U.S. Forest Service is allied with the state to create cooperative organizations that will lead to more cutting of this currently very carbon-dense, rich forest of New England. The Department of Energy Resources in Massachusetts has already put forth proposed changes and regulations that would increase the amount of forests that qualify for subsidies for bioenergy as a renewable resource, (aka burning wood) as an alternative energy resource, resulting in an enormous outcry from the scientific community, the NGO community and citizens! [Source 3]
- The 30x30 protection/restoration goal is actual far lower than what is needed. Some argue that we need half the earth to be protected in order for nature to function. [Source 3]
- Policy Suggestion regarding privately owned forests and relatively small forest plots: people be paid for ecosystem services of storing carbon and promoting old-growth biodiversity and the resiliency to climate change that these forests provide. We need to compensate private land owners for leaving forests standing. We need to invest in methods and people to monitor lands to ensure that payment isn't made where conditions are not maintained as promised. [Source 3]
- There should be no more timber harvesting on state forest lands. There should be a regulatory system in place to control this. [Source 3]
- Remove all subsidies allowing for the wood pellet industry to function (of particular concern at the moment in the Southeastern U.S.) [Source 3]
- P.S. Just so it is on-the-record: We should be managing our native grasslands and restoring them much as we are proposing for old-growth and mature-growth forests.
- Include in your coding comments all of the research conducted by the United Nation's Intergovernmental Panel on Climate Change (IPCC) regarding the importance of mature forests and their significance and how to best protect/preserve/manage them.

There are many other important reasons to more fully protect mature growth forests than is proposed in this amendment, and many more sources that could be referenced. But I am out of time...which is also my excuse for the rambling nature and poor writing quality of this text.

The proposed amendment is a much-needed step in the right direction, but falls far short of sufficiently protecting old-growth and mature forests completely! The proposal should include more protections for mature growth forests. Furthermore, troublesome language in the proposal allows agencies to still log old growth for various ecological exceptions. Both of these insufficiencies must be corrected within the proposed amendment. Instead we must ensure we practice "Proforestation" (leaving older and middle-aged forests intact because of their superior carbon-sequestration abilities).

## SOURCES

Source 1:

"DEFINING MATURE AND OLD-GROWTH FORESTS" by USDA, U.S. Forest Service, April 2023, FS-1215b. Link [defining-mature-and-old-growth-forests-factsheet.pdf \(usda.gov\)](#)

Source 2:

"How much old growth forest remains in the US?" By The Understory, Rainforest Action Network; Blog Posted by Brant Ran; November 11, 2008. Link [How much old growth forest remains in the US? - The Understory - Rainforest Action Network \(ran.org\)](#)

Source 3:

"Why Keeping Mature Forests Intact is Key to the Climate Fight" by Fen Montaigne; October 15, 2019; YaleEnvironment360. Link [Why Keeping Mature Forests Intact Is Key to the Climate Fight - Yale E360](#)

Source 4:

"Why Mature and Old Forests are so Important for Climate Mitigation and Adaptation" by Beverly Law and William Schlesinger; The Hill; Cary Institute of Ecosystem Studies; August 23, 2022. Link [Why mature and old forests are so important for climate mitigation and adaptation \(caryinstitute.org\)](#)

Source 5:

"US Doctors are Prescribing Nature in 35 States" by Duncan Murdoch; Nature Connection Guide. Link [US Doctors are Prescribing Nature in 35 States - Nature Connection Guide](#)