

Dear Secretary Vilsack and Secretary Haaland,

Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As you know, protecting our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale, right now.

Protecting these climate-critical forests from logging requires a definition of 'mature' as trees 80 years old and older. Using that definition as the critical age would protect our most climate and carbon-critical forests, and only in rare and exceptional circumstances should logging of these giants be allowed.

A recent USDA Secretarial Memorandum stated that *"A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion."* This statement represents an alarming and inaccurate assessment of threats to mature and old-growth forests.

The Hermit's Peak and Calf Mountain fires of New Mexico Spring of 2022 are perfect examples of controlled burn fires getting disastrously out of control, or smoldering unattended, and destroying 341,471 acres of irreplaceable forest and 903 human structures before they were extinguished after months of burning. Controlled burns are not the answer to the erratic temperature and wind increases that the West, Southwest and Northwest will continue to face in our forested lands.

According to the Congressional Research Service Wildfire Statistics report from July 11, 2022 "Wildfires are unplanned fires, including lightning-caused fires, unauthorized human-caused fires, and escaped prescribed fire projects. The report states that "most wildfires are human-caused (89% on average from 2017 to 2021)."

Numerous examples of logging projects across the country that target mature and old growth trees, including projects in the name of "restoration", "hazardous fuels reduction" and "wildfire mitigation," underscore this point. Not only is the threat of logging to mature and old-growth federal forests pressing, it is one that is entirely within federal land management agencies' power to address. Such a rule can be readily structured to leave room for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations.

President Biden's Earth Day Executive Order rightly recognized the critical role mature and old growth forests play as a climate solution, and the urgent need to confront the threats forests face. If continued logging of these trees is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature & old-growth trees and forests to logging will only make the climate crisis worse: scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to

the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires.

If the Biden administration is to do all it can — and must — to limit atmospheric carbon levels, and demonstrate 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 on the necessary urgent time frame, with opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

Please, right now, initiate a rulemaking based on a definition of mature forests and trees of 80 years, to permanently end the avoidable loss through logging of their critically important carbon, water and wildlife values. You have the authority and power to do so. This is what the American taxpaying public wants right now to ensure a future on Earth.

Sincerely,

Dr. Pamela Youngquist