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Dear Secretary Vilsack and Secretary Haaland,

RE: Define and Map Mature and Old Growth Forests

Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. These comments are submitted on behalf of the Great Old Broads for Wilderness (Broads), the Cascade-Volcanoes chapter in northern Oregon and Southwest Washington. The Broads mission is protection of public lands; we also advocate for climate action.

Protecting our remaining mature and old-growth forests and trees on federal lands is one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. Mature and old growth forests sequester and store the most carbon, and the majority of the US forests in these age classes are found in federal forests. The greatest threat to these forests is logging. The Broads urge the definition of 'mature' forests to be forests and stands of trees 80 years of age and older. Using that definition as a benchmark would protect our most climate and carbon-critical forests, and only in rare and exceptional circumstances should logging of these giants be allowed. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. They also provide, across forest types, vital habitat and biodiversity benefits, and protect 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.

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 and 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. More carbon is released to the atmosphere if a forest is logged than if the same area burns in a wildfire. Most of the carbon remains in burned trees, alive and dead.

I live in Oregon, as do most members of our Broads chapter, and we have been directly impacted by climate change. During the 2020 wildfires we had the worst air quality in the country, including in the Portland metro area far from the fires. In 2021 we experienced a heat dome with temperatures to 116 degrees, and almost 100 Oregonians died from the excessive heat. Most Oregon counties have been experiencing drought in the past two or more years. In addition to being impacted by climate change, the Pacific Northwest has a great opportunity to mitigate climate impacts by preserving mature and old

growth trees, which store the most carbon and continue to sequester high amounts of carbon in our wet and highly productive western forests.

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. 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, tree plantations and brush, not big, fire-resistant trees that have survived for generations.

When mapping mature and old growth forests on USFS and BLM lands, the Broads request that you include mapping of primary forests—forests that have never been logged—even if they have been subject to natural disturbance such as wildfire, windfall or disease. The natural recovery from these disturbances provides vegetation diversity of species and age class, including surviving older trees and snags. We also urge to retain burned mature and old growth forests in the inventory/mapping, without allowing post-fire logging. The most carbon is lost from post-fire logging, not from the wildfires themselves.

There are already several inventories of US forests, and we encourage you to include available data in your mapping. The mapping/inventory due by April 2023 can best be accomplished by synthesizing available data.

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.

In summary, Great Old Broads for Wilderness urges the US Department of Agriculture and US Department of Interior to work together to complete the inventory and mapping by April 2023 based on a definition of mature forests and trees of 80 years and older. And then, with recognition of the urgency of the task to protect our climate, to initiate a rulemaking based on this definition, to permanently end logging of these forests to protect their critically important carbon, water and wildlife values.

Sincerely,



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Leadership Team