

August 30, 2022

Jamie Barbour
Assistant Director, Ecosystem Management Coordination
1220 SW 3rd Ave.
Portland, OR 97204-2825
503-708-9138
Roy.Barbour@usda.gov

Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Re: Request for Information on Federal Mature and Old-Growth Forests (Executive Order 14072) #NP-3239

Dear Public Lands Stewards:

Thank you for advancing President Biden’s Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Protecting our remaining mature and old growth forests and trees on federally-managed public lands is one of the simplest and most cost-effective climate policies the United States can implement. As the climate and biodiversity crises grow exponentially worse, it is critical that you act urgently to fulfill the President’s directive to provide lasting protections for these ecosystems.

President Biden’s Executive Order rightly recognized the critical role mature and old growth forests play as a climate solution. Yet in striking contrast, federal public land stewards continue to propose short-sighted logging in these critical climate forests. Take for example the egregious Flat Country Timber Project, which proposes to clearcut over 1,000 acres of mature and old-growth trees up to 170 years old in the Willamette National Forest. With units directly adjacent to the Mt. Washington Wilderness, this cherished area provides habitat for imperiled species like the Northern spotted owl, crucial carbon storage, and the source of drinking water for tens of thousands of people downstream. Neither we nor the generations that will follow can afford to lose these forests and the many values they represent; mature and old growth forests are worth far more standing.

For the purpose of protecting these climate-critical forests from logging, definitions of mature and old growth forests and trees must be conservative, science-based, and regionally-focused. ‘Mature’ should be defined as trees that are 80 years or older, a benchmark that would effectively safeguard our most climate and carbon-critical forests. These forests collectively contain the bulk of the carbon already stored in federally-managed public forests and they continue to sequester carbon at high rates. They also provide vital habitat and biodiversity benefits across forest types, help maintain greater stream flows, and support important sources of drinking water for communities. Protecting mature forests and trees today will provide the foundation to recover old growth ecosystems that have largely been decimated by logging across the landscape.

A recent USDA Secretarial Memorandum inaccurately claimed 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.” Indeed, logging projects that target fire-resistant mature and older growth forests are proposed under the guise of “restoration,” “hazardous fuels reduction,” and “wildfire mitigation.” This

represents an alarming and inaccurate assessment of threats to mature and old-growth forests. Uncharacteristically severe wildfire is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations. Further, 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. Long-lasting protections for carbon-storing old growth forests are the answer, not more greenwashing of thinly-veiled timber grabs, and federal agencies have the ability to include ecologically-appropriate fire risk reduction and investments in community preparedness in those protections. Moreover, the fact that wildfire threat is an increasing risk because of climate impacts does not somehow remove logging as a threat. Federal agencies continue to propose new mature and old growth logging and aggressively conduct post-fire logging, exacerbating the damage caused by fire by releasing remaining stored carbon, disturbing sensitive soils, and introducing non-native invasive plant species.

If the Biden Administration is to do all it can—and must—to limit atmospheric carbon levels and demonstrate international leadership, protections for mature and old growth forests must be established through binding regulations that will endure in future administrations, much like the Clinton-era Roadless Rule. 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, we urge the Forest Service and Bureau of Land Management to work together to initiate a rulemaking based on a conservative, science-based definition of mature forests and trees of 80 years to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging. In the interim, both agencies must cease proposing new logging in mature and old-growth forests and rescind decisions authorizing logging in these forests.

Sincerely,

Jack	Duggan	Jacksonville	OR
Sally	Cadonau	Beaverton	OR
Giancarlo	Panagia	Gunnison	CO
Greg	Zupansic	Roseburg	OR
Anna	Narbutovskih	Guerneville	CA
Carrie Ann	Strub	Stillwater	MN
Caephren	McKenna	Oakland	CA
Jennifer	Normoyle	Hillsborough	CA
Cindy	Wren	Clarksville	GA
Kate	Kenner	Guilford	VT
Shalynn	Pack	Junction City	OR
Vic	Bostock	Altadena	CA
Jess	DePew	Lebanon	OR
Georgia	Brewer	Sherman Oaks	CA
Sabina	Keif	Braintree	MA

Jain	Elliott	Eugene	OR
Esther	Garvett	Miami	FL
Gloria	Shen	Asheville	NC
Abigail	Villodas	Cave Creek	AZ
Dennis	Dougherty	Novato	CA
Jodi	Rodar	Pelham	MA
Steve	Green	Burlington	WA
Dianne	Ensign	Portland	OR
Linda	Jones	Cornville	AZ
Martha	Brinson	Eugene	OR
Dan	Howard	Eugene	OR
Gail	Battaglia	Jacksonville	OR
Julie	Petrocelli	Kirkland	WA
Caroline	S√©villa	Schenectady	NY
Phe	Quillian	Talent	OR
Molly	Dunn	Drain	OR
Roberta	Boyden	Eugene	OR
John	Herberg	Eugene	OR
Sandy	Pfeiffer		WA
Elaine	Becker	Roanoke	VA
Larry	Morningstar	Talent	OR
Jody	DeLand	Bend	OR
Bill	Rubin	Decatur	GA
Diane	Hailey	Cave Junction	OR
Kimberly	McConkey	Anchorage	AK
Bill	O'Brien	Beaverton	OR
Star	Hyams	Eugene	OR
Diane	Faircloth	Hartly	DE
sue	oconnor	Eugene	OR
Nikki	Dennis	Portland	OR
Brian	Lyons	Orocovis	PR
Mark	Fortin	Lexington	MA
Dean	Wilson	Plaquemine	LA
Matt	Riley	Oakland	OR
Deborah	Noble	Eugene	OR
Kaley	CoslowSauer	Springfield	OR
Kevin	Higgins	Portland	OR
Carlan	Kephart	Springfield	OR
Loke	Jones	Portland	OR
Travis	Allen	Eugene	OR
Joni	Zimmerman	Newberg	OR

Ann	Fisher	West Springfield	MA
Lindsey	Housel	Portland	OR
James	Jacobson	Eugene	OR
Marcy	Graham	Florence	OR
Roberta	Swanson	Hamilton	MI
Andrew	Simrin	Eugene	OR
Kyle	DeBord	Eugene	OR
Bijan	Foroutan	Encino	CA
Daniel	Miles	Corvallis	OR
Gregory	Monahan	Portland	OR
Tina	Brown	Anacortes	WA
Ken	Martin	Newtown	CT
Dawn	Albanese	Elk Grove Village	IL
Susan	Farrell	Eugene	OR
Deborah	Reiter	Amherst	MA
Virginia	Purvis	Salem	OR
Lori	Esposito	Annandale	VA
Joan	Silaco	Queens Village	NY
Kelley	Tom	Portland	OR
Martin	Fisher	Portland	OR
Heather	Clotfelter	Wichita	KS
Constance	Quanbeck	Eugene	OR
Treothe	Bullock	Portland	OR
Ian	Henry	Portland	OR
Javier	Rivera-Diaz	Brooklyn	NY
Penelope	Kaczmarek	Siletz	OR
Constance	Huff	Vida	OR
Audrey	Collins	Chiloquin	OR
Colonel	Meyer	North Port	FL
Dylan	Huber-Heidorn	Eugene	OR
Benton	Elliott	Eugene	OR
Meg	Blanchet,	Eugene	OR
Stacy	Alaimo	Eugene	OR
Betsy	Fairlamb	Eugene	OR
Greer	Dove		
Wendy	McGowan	Eugene	OR
Jon	Wood	Portland	OR
Elyse	Shoop	Portland	OR
Judith	Hazelton	Bennington	VT
Regan	Fisher	Portland	OR
Ruth	Schmidt	Eugene	OR

Chris	Aldrich	Worcester	MA
Randi	Byron	Avon	CT
Sara	Graziosa	East Canaan	CT
Debi	Griepsma	Fontana	CA
Jesse	Hardval	Pendleton	OR
Jeffery	Blanton	Cherryville	NC
Joana	Kirchhoff	Portland	OR
Katsumi	Watanabe	Torrance	CA
Sandra	Boylston	Sanford	FL
Celeste	M Anacker	Santa Barbara	CA
Heidi	Siebens		
Dana	Bleckinger	Yachats	OR
Karla	Taylor	Olympia	WA
Lawrence	Siskind	Eugene	OR
Laurie	Tabor	Lake Mary	FL
Gwen	Wolfram	Springfield	OR
Arthur	Gardener	Eugene	OR
Iorraine	foster	Portland	OR
Dave	Metz	Cottage grove	OR
Anna	Joseph	Stamford	CT
Leland	Block	Portland	OR
Mike	Horner	Portland	OR
Allen	Todd	Corvallis	OR
Pablo	Bobbe	New York	NY
Denise	LaChance	Winnetka	CA
Dominique	Landis	Citrus Heights	CA
Rhana	Wyble	Groves	TX
Lottie	Rohde	Eugene	OR
Alim	Ringgold	Portland	OR
Cricket	Blanton	Melbourne	FL
Ibrahim	Moustafa	Portland	OR
Helen	Caswell	Salem	OR
Brian C	Jones	Ludlow	VT
Donna	Pemberton	Cocoa	FL
Becky	Anderson	Bellingham	WA
Pamela	Vasquez	Salem	OR
Marian	Blankenship	Eugene	OR
Olivia	Ferguson	Bellingham	WA
Mary	Murphy	Bend	OR
Marie	Dickenson	Hayes	VA
Cyndi	Anderson	Brownsville	OR

Elaine	Fischer	Roanoke	VA
Katalin	Wilson	Corvallis	OR
Nadene	LeCheminant	Salem	OR
Angelique	St Pierre	Melbourne	FL
Rosemary	Maziarz	Saint Charles	IL
Carol	Savonen	Philomath	OR
JL	Angell	Rescue	CA
Forest	Shomer	Port Townsend	WA
Mathieu	Federspiel	Powell Butte	OR
Lorenz	Steininger	Stafford	VA
Steve	Brown	Medford	OR
Sandra	Joos	Portland	OR
Kevin	Loss	Salem	OR
Mark	Mansfield	Geneva	NY
Marika	Maritz	Portland	OR
John	Ulloth	Van Nuys	CA
Kathryn	Van Note	Lodi	CA
Kian	Daniel	Milwaukee	WI
Rachael	Friese	Eugene	OR
Laurel	Eckert	Kansas City	MO
Gail	Wahl	Coos Bay	OR
Anna	Brewer	Phoenix	AZ
Lisa	Taylor	Los Angeles	CA
Paul	von der Mehden	Eugene	OR
Robin	Swanson	Honolulu	HI
Kimberly	Carignan	Kewadin	MI
Midori	Furutate	New York	NY
Klaus	Pressler	Eugene	OR
Dana	Burns	Bloomington	IN
Victoria	Eells	Gold Beach	OR
Marilyn	Koff	North Las Vegas	NV
Steven	Prince	Eugene	OR
Jeffrey	Morey	Eugene	OR
Elizabeth	Watts	Boynton Beach	FL
Lee	Webb	Portland	OR
Aaron	Ucko	Rockville	MD
Grisel	Rodriguez	Miami	FL
Catherine	Marcquenski	Tomahawk	WI
Paul	Vilches	Pembroke Pines	FL
Michael	Graney	Eugene	OR
Rachael	Latimer	Eugene	OR

Lynn	Griffith	Bainbridge Island	WA
Beverly	Nichols	Las Vegas	NV
Jason	Fish	Desert Hot Springs	CA
Donna Jean	Sharp	Veneta	OR
Freya	Harris	Atlanta	GA
William	Dearstyne	Salem	MA
Rachel	Rothberg	Bellingham	WA
J. David	Scott	Cottage Grove	OR
M	Jones	Portland	OR
Robyn	Skilton	Yelm	WA
Romney	Shiffer Taylor	Cottage Grove	OR
Jorge	De Cecco	Oregon City	OR
Justin	Overdevest	Eugene	OR
steph	spencer	Bend	OR
Terry	Tedesco	Tucson	AZ
Jere	Rosemeyer	Eugene	OR
Ali	Van Zee	Fort Bragg	CA
Susan	Welch	Marion	IL
Matty	Whyte	Burien	WA
Bobbie	Hensley	Greeneville	TN
Linda	Kelley	Eugene	OR
Elaine	Smith-Koop		
Stephen a	Johnson	Portland	OR
Lydia	Scott	Eugene	OR
barbara	levedahl	Baltimore	MD
Mitchell	Dormont	New Port Richey	FL
VIRGINIA	MENDEZ	Hollywood	FL
Sara	Graziosa	East Canaan	CT
Joan	Walker	Big Pine	CA
Maryellen	Redish	Palm Springs	CA
Laura	Chinofsky	Southampton	PA
James	Gent	Eugene	OR
Shelly	Dicks	Eugene	OR
Kris	N.	Portland	OR
Claudia	Garoutte	Dewey	AZ
Richard	Barker	Beaverton	OR
Barbara	Danko	Yachats	OR
Teresa	Silliman	Bend	OR
Annalena	Hongo	Eugene	OR
Carol	Goerke	Tempe	AZ
Barb	Shamet	Wolf Creek	OR

Diana	Huntington	Eugene	OR
Amber	Boydston	Portland	OR
Robert	Boyer	Parker	CO
Jeanette	LeTourneux	Jacksonville	OR
william	crosby	New Britain	CT
Stacey	Holliday	Chattanooga	TN
D	Stirpe	Portland	OR
Sarah	Hale	Eugene	OR
Rachel	Mulder	Portland	OR
Richard	Tetley	Eugene	OR
Dianne	Douglas	Phoenix	AZ
Kim	Judkins	Scottsdale	AZ
Erika	Leaf	Eugene	OR
kim	davis	Salem	OR
Francis	Mangels	Mount Shasta	CA
janice	jensen	Eugene	OR
Barbara	Bernstein	Portland	OR
Justin	Truong	San Francisco	CA
Virgene	Link-New	Anacortes	WA
Michael	Manzano	Silverton	OR
Elizabeth	Mitchell	Eugene	OR
Taylor	Martin	Bellingham	WA
Denise	Lytle	Woodbridge	NJ
Jonah	Kreitzberg	Eugene	OR
Satya	Vayu	Portland	OR
Sandra	Woodall	San Antonio	TX
Nicole	Laemers	Hyattsville	MD
Stu	Lipton	Eugene	OR
Amy	Monahan	Portland	OR
Anna	Putman	Klamath Falls	OR
Laura	Ouellette	Albany	OR
Steve	Hahn	Bellingham	WA
Doug	Krause	Fargo	ND
Mary	Duvall	Clatskanie	OR
Linda	Farmer	Eugene	OR
Timothy	Cooke	Portland	OR
Jennifer	Godfrey	Seattle	WA
Rebecca	Lipton	Springfield	OR
Philip	Ratcliff	Salem	OR
Melian	Kiyak-Boughton	Eugene	OR
Susan	Peirce	Santa Fe	NM

Shannon	Hunter	Gladstone	OR
Mark	Blandford	Amarillo	TX
Frances	Rove	Leawood	KS
Jesse	Weeg	Portland	OR
Steve	Staten	Salem	OR
Julie	Polhemus	Eugene	OR
Angelica	Daoang	Olympia	WA
S	K	Salem	OR
Julie	Walker	Portland	OR
Joshua	Wright	Union	WA
Maria	Aragon	Alamogordo	NM
Carolin	Schellhorn		
Patricia	Hathaway	Eugene	OR
Chris	Drumright	Murfreesboro	TN
Paula	Beckley	Eugene	OR
Keith	Jacobsen	Kenmore	WA
Daniel	Morphis	Eugene	OR
Martha	Hart	Arcata	CA
Hugh	Schmidt	Tacoma	WA
Joshua	Welch	Eugene	OR
Cynthia	Townsend	Portland	OR
Susanna	DeFazio	Sisters	OR
Lon	Otterby	Marcola	OR
Kim	Craig	Eugene	OR
Leigh	Fabbri	Plano	TX
Marie	Wakefield	Newport	OR
Fred	Chambers	Cottage Grove	OR
Renee	Patrick	Bend	OR
Tammy	Luppino	Winchendon	MA
Stephanie	Tidwell	Eugene	OR
Selena	Blick	Bend	OR
Tri	Sanger	Portland	OR
Chris	Hatten	Stayton	OR
Philip	Simon	San Rafael	CA
Frank	Toriello	Montague	CA
Judith	Embry	Florida	MA
Linda	Schmoldt	Portland	OR
Meryl	Pinque	Bangor	ME
Pamela	Shaw	Cincinnati	OH
Letitia	Noel	Chicago	IL
Gloria	Fisher	Portland	OR

Danika	Esden-Tempski	Eugene	OR
Chris	Riesch	Pawling	NY
Michael	von Sacher-Masoch	Everett	WA
Rhett	Lawrence	Portland	OR
Wendy	Forster	Schenectady	NY
Andrew	Kumler	Springfield	OR
Raleigh	Koritz	Minneapolis	MN
Jesse	Rapp	Eugene	OR
Christa	Knittle	Springfield	OR
Jay	Richards	Bend	OR
Gabrielle	Karras	Eugene	OR
Cynthia	Enlow	Albany	OR
Brian	Click	Portland	OR
Katherine	Quinlan	Bandon	OR
Tyler	Yada	Lodi	CA
Chelsea	Veltri	Eugene	OR
Susan	Buswell	South Beach	OR
Nancy	Stamm	Fort Pierce	FL
Leon	Werdinger	Joseph	OR
Sherry	Franzen	Blue River	OR
Lawrence	Crowley	Louisville	CO
Craig	Cline	Salem	OR
John	Altshuler	Eugene	OR
Wally	Sykes	Joseph	OR
Caryn	Ackerman	Bradenton	FL
Dean	Shamblen	Emerson	NE
Maryann	Staron	Hometown	IL
Tracey	Aquino	Virginia Beach	VA
Dianna	Pounder	Eugene	OR
Vicki	Seglin	Evanston	IL
Chris	Casper	Stevens Point	WI
Frances	Mackiewicz	Beachwood	NJ
Wendy	Morrison		
Kim	Peterson	Cloverdale	CA
Ann	Nowicki	Eugene	OR
Tracy	Sweetland Phillips	Denver	CO
Beth	Chao	Lawrence	KS
Deb	Rosenberger		
Sally	Perkins	Rainier	OR
Laurie	Parrish	Eugene	OR
Melinda	Roddick	Telluride	CO

Joyce	Heyman	Norco	CA
Roy	Ahl	Eugene	OR
Suzanne	Hodges		CA
Arjen	Hoekstra	Eugene	OR
Paul	Kuck	Portland	OR
Karen	DeBaal	Springfield	OR
Katherine	Wright	Milford	MI
Bridget	Dahlman-Oeth	Bellingham	WA
Tyler	Walsh	Portland	OR
Matthew	Oliphant	Bend	OR
John	Wagoner	Mill Valley	CA
Robert	Wisseman	Corvallis	OR
Carol	Tollefsen	Carnation	WA
Janice	Parker	Dallas	OR
Frances	Dunham	Ashland	OR
Pamela	Green	Belvedere Tiburon	CA
Jordan	Longever	Dorchester	MA
Laura	Ray	Alexandria	VA
Ben	Stickney	Portland	OR
Amu	Rossmann	Corvallis	OR
Saran	K.	Los Angeles	CA
Len	Greenwood	Selma	OR
Marilyn	McFarlane	Portland	OR
Jule	Garrison	Daleville	AL
Felicia	Sanders	Dorena	OR
Jodi	Igard	Valley Village	CA
Bellinda	Rolf-jansen	Oosterbeek	AL
Mark	Van Ryzin	Eugene	OR
Bethany	Cotton	Eugene	OR
Juanita	Rinas	Eugene	OR
Connie	Devine	Yerington	NV
Kathleen	Mireault	Jamaica Plain	MA
Derek	Benedict	Lynnwood	WA
Nancy	Chismar	Edison	NJ
Sandi	Aden	Lincoln	NE
David	Jackson	Battle Creek	MI
John	Selove	Eugene	OR
Kyenne	Williams	Portland	OR
Karen	Fletcher	Portland	OR
Dena	Turner	Portland	OR
Linda	Watts	Florence	OR

Tomasita	Med ^v ol	San Francisco	CA
Lanelle	Lovelace	Columbia	CA
Tracy	Ouellette	Bow	WA
Diane N	Meyer	Ashland	OR
Katy	Bloch	Eugene	OR
Margaret	Hawthorne	Portland	OR
Leigh	Blake	Trail	OR
Janell	Smith	Bradenton	FL
Marsha	Barr	Eugene	OR
Mary Jo	Mann	Portland	OR
Ryan	Schuster	Portland	OR
Ron	Wallace	Eugene	OR
Dean	Grice	Rugeley	HI
Sally	Browne	Roseburg	OR
Mary	Vincent	Newark	CA
Bonnie	Faith	Cambridge	MA
Marci	Barfknecht	Truman	MN
William	Koethke	Wolf Creek	OR
Dianne	Douglas	Phoenix	AZ
Jeff	Levicke	Valley Village	CA
Michael W	Evans	Los Angeles	CA
Dennis	Pennell	Vancouver	WA
Gwendolyn	Stone	Myrtle Creek	OR
Melissa	Gentry	Molalla	OR
Mallorey	Roe		WA
Norma	Kafer	Phoenix	AZ
Alodie	Spires	Chico	CA
Joanna	Vintilla	Seattle	WA
Michael	Friedmann	Bronx	NY
Susannah	Biggs	Columbia City	IN
Cecilia	Barea	Brooklyn	NY
Deb	Sands	Deforest	WI
Sue	Sch ^v ommer	Ulm	DE
Kelly	Riley	Hatfield	PA
Carrie	Lyons	Grants Pass	OR
Thomas	Bogenschild	Springfield	OR
Randall	Gicker	Blue River	OR
Kelly	Flowers	Springfield	OR
Sophie	M	Hope	ID
Keith	Larson	Portland	OR
Marc	Tait-Condle	Gresham	OR

Marsha	Carrino	Phoenix	OR
Douglas	Kacir	Portland	OR
Sandra	Charbonneau	Steilacoom	WA
Whitsitt	Goodson	Portland	OR
Marguerite	Elia	Sacramento	CA