

Deer Creek Valley Natural Resources Conservation Association

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August 30, 2022

Re: Request for information on federal old growth and mature forests (Executive Order 14072) #NP-3239

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

Thank you for accepting these comments on behalf of Deer Creek Valley Natural Resources Conservation Association, a 40-year, all-volunteer 501(c)3 non-profit organization based in the Illinois Valley in rural southwestern Oregon. Our mission is to promote and protect environments and species that sustain the web of life and human communities.

We have a long history of participating in public land management planning and projects in Southern Oregon and working toward sustainable relationships with natural community ecosystems on our public lands. Our organizational leaders have been part of a core planning team with USFS for a project in the Prospect Ranger District and entered into a MOU with the BLM in 2004 to develop the Natural Selection Alternative (NSA) for the 7,400-acre South Deer project in the Deer Creek watershed. The NSA was the first community alternative to successfully complete the full NEPA process in the Medford District, BLM and was chosen in the Decision Record as the best alternative for a section of land.

Our community is intimately connected to public lands issues and directly impacted by public land management. We are on the frontlines of the crises caused by historical and current day logging practices that increase fire hazards near our homes and properties, dry up our domestic water and degrade our streams and rivers, exacerbate local to global climate extremes, drive extinctions of countless species, and destroy the natural beauty and quality of life that our rural, recreation-based economy and property values rely on, among innumerable other adverse impacts. The current rapid liquidation of private corporate timber lands in our communities makes it even more imperative to protect ecosystems on public lands. The health of our communities and future generations is dependent on the institution of lasting protections from unsustainable logging and other harmful management practices on public lands.

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 forest ecosystems and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. But time is running short: the climate and biodiversity crises are growing exponentially worse and it is critical that you fulfill the President's directive to provide lasting protections for these irreplaceable ecosystems on public lands.

For the purpose of protecting these climate-critical ecosystems from logging, "mature" should be defined as 80 years and older. By setting logging limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older

ecosystem elements provide for future generations. These older ecosystems collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. They also provide, across ecosystem types, vital habitat and biodiversity benefits, and important sources of drinking water for communities, as well as providing crucial fire resiliency necessary for protecting homes and communities from wildfire. Critically, protecting mature forest ecosystems 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 ecosystems is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature & old-growth ecosystems to logging will only make the climate crisis worse: Scientific research indicates that logging of federal lands is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, if not greater than, levels associated with wildfires. Furthermore, while ecosystems have evolved with and are well adapted to wildfire, logging is an unnatural and destructive activity that destroys complex natural processes and relationships between plant and animal species that are essential for the health and integrity of natural ecosystems.

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 ecosystems. Numerous examples of logging projects in our local watershed and 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. The federal timber sale program, which consistently targets mature and old growth ecosystems, must be abandoned in order to ensure meaningful protections of mature and old growth ecosystems, our nation's most treasured public lands. Not only is the threat of logging to mature and old growth federal lands pressing, but it is also one that is entirely within federal land management agencies' power to address.

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 the opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

We need definitions for communicating how ecosystem community trees and other species are sustained. It is not through definitions of forests as "land stocked with trees". We need definitions for communicating what an ecosystem community of species is, the kind of complex relationships and natural processes required for sustaining them, and what must be done to restore the same human relationships we evolved from that sustain ecosystem community species. We must move away from definitions that focus solely on trees, and move towards definitions that consider ecosystems as complex, wholistic, interdependent ecosystems of species, in which all the parts of the system are necessary to sustain the whole. We must move away from agricultural-based models and relationships

that treat trees as crops and forests as tree farms, as this colonial mentality is at the root of our current crises.

As critically important as it is to inventory and protect what's left of our last remaining mature and old growth ecosystems, we also need to allow the younger areas that are in various stages of recovering from previous logging to be allowed to reach maturity. This recovery process requires allowing natural succession and natural selection processes to function. An ecosystem must go through the earlier stages of succession in order to reach later stages of succession. If we allow this succession process to occur through natural selection, this process of genetic testing for compatible traits will ensure that ecosystems are able to adapt to changing climates and conditions and is the only way to ensure optimal health and resilience, as well as crucial connectivity corridors for countless species. Please include in your inventory efforts a thorough analysis of the current status and management history of all lands that are younger than the 80-year threshold in order to assess the role these recovering ecosystems will play in contributing to the future mature and old growth ecosystems on public lands and their associated values and ecosystem services.

In summary, we urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature ecosystems as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water, fire resiliency, and wildlife values to logging.

Thank you for consideration of these comments,

Sincerely,

A handwritten signature in black ink, appearing to read "Serena Barton". The signature is fluid and cursive, with a large loop at the end.

Serena Barton, President
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