From: Alexander, Mara - FS
To: Barndt, Scott -FS
Subject: Fw: [External Email]Protect Old Growth Forests and watersheds from logging
Date: Tuesday, October 4, 2022 1:54:40 PM
Attachments: Outlook-rh4jasy1.png

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Caring for the land and serving people

From: Lori Hood <lorihood3@gmail.com>
Sent: Tuesday, October 4, 2022 3:32 PM
To: Alexander, Mara - FS <Mara.Alexander@usda.gov>
Subject: [External Email]Protect Old Growth Forests and watersheds from logging

[External Email]
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Dear Forest Service:

Thank you for taking comments to advance President Biden's Executive Order 14072 on Strengthening the Nation's Forests, Communities, and Local Economies. 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 undertake.

While the Executive Order 14072 asks to identify forests at risk, inventories have already been developed by private researchers using high-resolution mapping along with Forest Inventory Analysis (FIA). The definition of Mature and Old Growth Areas can be simplified overall to an 80-year age. Forests at this age are developing old growth characteristics such as downed and dead trees, more complex mycorrhizae soil systems and others depending on specific forest characteristics.

The federal MOG inventory needs to fully recognize widespread logging as both the major cause of the severe lack of old-growth forests and the ongoing depletion of old-growth forest. Acknowledgment of the impact of logging is completely missing from the EO and the subsequent Secretarial memo. The loss of old-growth forests and large trees, in turn, is contributing to the global and biodiversity crises that the president called out in his Executive

Order.

To address this, there should be a national rulemaking proposed alongside the inventory to fully protect all federal Mature and Old Growth forests (MOG). To be effective and provide 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 quickly, with the opportunity for public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

We request that the Biden administration make a statement prior to the COP27 on how the MOG inventory process and a national rulemaking process to protect MOG from logging is a natural climate solution that will also achieve 30% protection by 2030 (Exec. Order 14008). We request that the MOG assessment and national rulemaking promote enforceable actions that directly addresses the accelerating climate and biodiversity crises contributed by logging and related land uses.

In summary, we request that you set the reference standard for mature forests/trees to those over 80 years nationwide. Forests at this age begin to exhibit a subset of old growth characteristics necessary to begin the recovery of depleted old-growth forests. The focus on protecting mature forests at this general age when old growth features emerge, results in the best protection of current carbon stocks, the rebuilding of biodiversity, and improved quality and quantity of drinking water sources.

Sincerely,

Lori Hood