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Comments: 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. 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 trees.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees over 80 years old. 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 elders be allowed. Protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems that 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 harvesting of these trees is allowed the climate crisis will only worsen. Timber harvesting kills more trees than fire, insects, and wind combined. Less than five percent of our nation's timber comes from our national forests; therefore, it would not be a great hardship to eliminate this source of wood products and instead allow our public forests to provide ecological services such as clean air, clean water, and wildlife habitat.

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 response to the Biden Administration's Request for Information (RFI) published in the Federal Register on July 15, 2022, seeking input on the development of a definition for old-growth and mature forests on Federal lands and requesting public input on five questions. This response is from Sierra Club's Upper Columbia River Group within the Washington State Chapter. Our mission includes the protection of the ecosystems of Eastern Washington and the Idaho panhandle, which are connected via overlapping river basins and forests.

We are grateful for President Biden's initiative and its pursuit of conservation goals in Executive Order (E.O.) 14072. In calling for old-growth definitions and inventories the RFI recognizes that the work the Forest Service (FS) should have done over the last 30 years according to a 1989 letter from the FS Chief to Regional Foresters, viz. [ldquo]Position Statement on National Forest Old Growth Values[rdquo] (10/11/1989), was, in fact, never completed:

[ldquo]Regions with support from Research shall continue to develop forest type old growth definitions, conduct old growth inventories, develop and implement silvicultural practices to maintain or establish desired old growth values, and explore the concept of ecosystem management on a landscape basis.[rdquo]

Whereas some [ldquo]forest type old growth definitions[rdquo] have been established, [ldquo]old growth inventories[rdquo] are few and far between. In the process of letting timber contracts in the Colville National Forest, the FS has responded to our concerns about mature and old-growth timber in the contract area that they

would only be identified as the logging is done. Mature and old growth inventories should be completed and made publicly available prior to forest [ldquo]treatments.[rdquo] And those inventories should indicate the size of any such stand and its wider ecosystem context so that comprehensive rather than isolated analyses can be conducted.

The RFI requests input on five questions. They are restated below with our responses.

1. What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?

First, we are concerned about the use of the words [ldquo]used for planning and adaptive management,[rdquo] because those words are ordinarily used by the FS and BLM to prioritize logging and other resource extraction. Scientific adaptive management would require the end of practices like logging, mining, grazing, and other resource extraction on public lands, because those activities contribute significantly to the degradation of those lands and the climate crisis that we face.

The criteria used should prioritize traditional and publicly shared values to restore an ecological balance to the ecosystems within which one finds mature and old-growth forests, e.g., habitat for native plant and animal species, for aesthetics and spiritual goals, for environmental protection, especially protection and production of unique resources like mature and old-growth trees.

2. What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

1. Important contributions to a stable climate. In the face of climate change, the potential for carbon sequestration within the landscapes and ecosystems supporting mature and old-growth forests should be a primary consideration.
2. In order to protect climate-critical forests from logging, [ldquo]mature[rdquo] should be defined as trees over 80 years old. Such a benchmark would protect our climate-critical forests.
3. There should be a recognition that the preservation of existing mature and old-growth forests is critical due to the current threat to them from extractive industries.
4. Any definition should eliminate timber harvesting in national forests, which are a resource for all our people. Less than five percent of our nation[rsquo]s timber comes from these forests, it would not be a hardship to eliminate this source of wood products.

3. How can a definition reflect changes based on disturbance and variation in forest type composition, climate, site productivity, and geographic region?

1. Definitions should be determined at a landscape and ecosystem level rather than a forest stand level, the latter being too narrow a focus for an inventory.
2. The FS and BLM should prioritize the removal of human-caused impediments to the recovery of fully functioning ecosystems. This will promote the recovery of forest ecosystems to a condition in which their carbon sequestration potential and natural resilience can be realized. It would also promote clean water, clean air, and the recovery of endangered species, all of which will contribute to the human connection to the natural world that supports human and ecological health.

4. How can a definition be durable but also accommodate and reflect changes in climate and forest composition?

The definition must recognize the serious dangers to the human social, physical, and psychological health of unrestrained resource extraction. Our nation[rsquo]s past history of heavy-handed, short-term, economically-focused management has played fast and loose with our own well-being, the well-being of our children and grandchildren, and the well-being and sustainability of our natural landscapes. Our responses to previous

questions should be considered in the effort to craft a durable and ethical policy with regard to forest composition.

5. What, if any, forest characteristics should a definition exclude?

The characteristics we have already noted should make it abundantly clear that we encourage those that are landscape and ecosystem in breadth. It will not do to focus on minutiae, i.e., on the manipulation and control of certain natural processes in order to harvest products focused on economic gain for government and business entities at the expense of the rest of society and of the planet. For example, standing dead trees left by a forest fire should not be excluded in the definition, because they represent a fragile ecosystem that has a natural ecological value greater than that of material for logging. In short, forest characteristics focused on promoting resource extraction should be excluded from the framework.

Thank you for the opportunity to respond to President Biden's Executive Order 14072. For the sake of our children and grandchildren and the natural world they will inherit, we look forward to a clear and sustainable path forward for our public lands.

Sincerely,

W. Thomas Soeldner