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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. Keeping in line with President Biden's Earth Day Executive Order, we urge that you protect old-growth forests.

Old-growth forests are extremely important to our ecosystem. These are defined as trees that are 80 years old and they are 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 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 & 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 that is at least comparable to, and probably greater than, levels associated with wildfires.

If the Biden administration is to do all it can [mdash] and must [mdash] 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, 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 forests and trees of 80 years, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.