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First name: Eleanor Last name: Sloan Organization:

Title:

Comments: Dear Secretary Vilsack and Secretary Haaland,

There is no graver threat to the future of humanity than climate change. Without addressing its causes and acting with urgency, we condemn ourselves, our children and all life on the planet to escalating disasters.

But the Forest Service and BLM continue to cut down mature and old-growth forests, the top performers of all nature-made carbon-reduction solutions. Multiple scientific studies show that logging contributes MORE CARBON to the atmosphere than forest fires, while eliminating the trees that best endure those fires and consume carbon at rates exponentially greater than younger trees.

Our National Forests, our publicly-owned forests, are being sacrificed to the detriment of the public - and our collective futures -- to generate revenue for timber companies and the US Forest Service. This is wrong and unjust, an extension of 'generations of pain and loss inflicted on many for the benefit of a few' - referred to in your recent tweet, Secretary Haaland.

The areas of National Forest that have been cut and replanted since 1990 should be categorized and managed as tree plantations. They supply more than enough for our national wood product needs going forward.

But it is urgent, in this summer of unprecedented heat, droughts, fires and floods, to immediately focus protection on the oldest trees in forests that continue to grow and act as carbon sinks at no cost to the nation or the public. The right thing to do is call for a moratorium on cutting them down, now.

Yet, with seemingly malign disinformation, your agencies continue to harvest mature and old growth trees, labeling projects as "restoration," "hazardous fuels reduction" and "wildfire mitigation." Examining the evidence of the big old trees trucked away from those sites, a jury would hold YOU accountable for exacerbating climate change.

Your agencies' hands are on the levers of power to stop this human- and biodiversity-genocide. President Biden's Earth Day Executive Order rightly recognized the critical role mature and old growth forests play as a climate solution. Every ton of carbon released in the atmosphere from felling a mature or old-growth tree means more damage to lives, property, businesses and our economy.

Federal agencies should establish GPS boundaries around these older forests to assure protection of their ecological and carbon benefits, based on satellite and LIDAR data such as that put together by Dominick Della Sala PhD and colleagues.

Per my expertise gained from three decades as an owner of 400-acres of managed-forestland in Vermont, and as a communications executive with a forestry organization, I strongly recommend defining 'mature' as 80 years and defining areas to be protected based on mapping.

Next, the Biden administration must do all it can to coify these protections through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done.

Now is the time to initiate a rule-making process structured to designate forest zones:

1. Continue timbering rotations in forests cut since 1990, designate those areas actively managed as tree farms.

- 2. Forest lands within a quarter mile (or 1000 feet) of villages and towns should be designated as mandatory home-hardening fire zones, with trees inside those boundaries managed for fire-risk reduction and incentives made available to be paid to homeowners to complete that work.
- 3. Set satellite-coordinate (GPS) boundaries for protection of forests defined by satellite/LIDAR for height, canopy cover and biomass, designate as mature and old-growth, 80-years and older, and preserve the moist biospheres that multi-aged trees that create, sanctuaries for wildlife and human recreation.

Please wield the power of your leadership position, most importantly - listen to the message of your conscience. Mitigate climate change by protecting old forests. It costs nothing. We are in a historic make-it or break-it era. Please stand up quality of life and our future.

With sincere wishes for your wise actions --

Lea Sloan

Owner of a managed forest in Vermont