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Comments: President Biden's Executive Order on "Strengthening the Nation's Forests, Communities, and Local Economies" must be given the means to protect our remaining mature and old-growth forests and trees from logging and development on federal public lands. Until the inventory process is complete and permanent protections are in place, we need an immediate moratorium on logging of mature and old-growth trees. Time is running short: the climate and biodiversity crises are growing exponentially worse, and it's critical that you fulfill the president's directive to provide lasting protections for these areas. In fact, while your agencies work to inventory mature and old-growth forests, logging continues, often under the false claim of reducing wildfire risk.

Individual trees and stands of trees, whether burned in a fire (dead or alive) or unburned, that are 70 years old or older, should be excluded from cutting and removal in any areas where logging operations are allowed, and should be prohibited from being cut and removed in any area where logging operations have already been approved. Such an action will ensure that our most climate- and carbon-critical forests are protected while the mapping project is completed and permanent protections are put in place. These older forests sequester carbon, and losing them will worsen the climate crisis. The forests provide vital habitat and biodiversity benefits, and they are important sources of drinking water for communities. These older forests will provide the foundation to recover old-growth ecosystems, which have largely been wiped off the map due to expansive logging across the United States.

Even though President Biden's Earth Day Executive Order rightly recognizes the critical role mature and old-growth forest ecosystems play as a climate solution and the urgent need to confront the threats that forests face, this Executive Order inaccurately claims that the threats to these ecosystems are from wildfires and other natural disturbances. This inaccuracy sets the stage to inappropriately justify logging these areas to save them. Logging in the United States currently contributes as much carbon to the atmosphere annually as burning coal.

Almost every logging project currently planned across the country targets some mature and old-growth trees/stands for removal, including projects in the name of "restoration," "hazardous fuels reduction," and "wildfire mitigation." This approach must stop!

If the Biden administration is to do all it can-and must-to limit atmospheric carbon levels and demonstrate international leadership, protecting mature and old growth trees/stands from logging must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done. It is critical for federal agencies to begin a rule-making process as soon as possible and enact a logging moratorium until new protections are in place.

I urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together immediately to initiate a rule-making process based on a minimum definition of mature forests and trees of 70 years old and older (to be adjusted by region, ecosystem and species to capture the age of reproductive maturity for all tree species) in order to permanently end the avoidable loss of their critically important ecosystem, carbon, water, and wildlife values to logging.

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