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Title:

Comments: Secretary Vilsack and Secretary Haaland, We are writing on behalf of our millions of members and supporters across the country to comment specifically on how you should define[mdash]and manage[mdash] mature and old-growth trees and forests to provide the greatest climate, biodiversity, and drinking water benefits for the United States. President Biden correctly identified these forests as critical to climate and biodiversity crises in Executive Order 14072. As these crises continue to have far-reaching impacts on communities across the country, it is essential the Biden administration do everything it can to address them. The United States has to take additional action to reduce climate pollution and position itself as an international leader in climate action if we all are to be spared the worst consequences of global warming. Conserving mature and old-growth forests on Forest Service and Bureau of Land Management lands offers one of the most straightforward, cost-effective ways to protect existing carbon stores while allowing these forests and trees to continue to pull vast amounts of carbon from the atmosphere [mdash] an essential climate strategy that scientists recognize must be implemented alongside cutting greenhouse gas emissions. Several scientific studies demonstrate that logging generates as much, and likely more, climate pollution than forest fires, while also degrading drinking watersheds and essential wildlife habitat. This threat must be addressed as part of any durable policy to protect mature and old-growth forests. As demonstrated by numerous projects across the country, mature and old-growth forests are still being logged for timber production, and require additional protections. For purposes of addressing the climate and biodiversity threats posed by logging, we recommend that you define old-growth and mature forests to include all stands and trees 80 years or older. These 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 they are the building blocks for recovering much-needed old-growth ecosystems across the country. A rule protecting these forests and trees can be readily structured to leave room for ecologically appropriate management that addresses fire and other non-commercial objectives, in particular because older, larger trees are more resistant to wildfires. As the Biden administration looks to show international leadership and make a lasting difference, these changes must be memorialized in binding regulations that will endure in future administrations, much as the 2001 Roadless Rule has done. To ensure a rule can be adopted on the necessary urgent time frame, with time for robust public engagement and environmental review, it is critical for your agencies to initiate a rule-making process quickly. In summary, we urge you, for purposes of permanently ending logging threats to the climate and biodiversity values of federal forests, to adopt a definition of "mature and old-growth" that includes all forests and trees older than 80 years. It is critical that your agencies move quickly to propose a rule that would protect these trees and forests from logging, with whatever exceptions can be shown to be necessary to preserve their values, allow for necessary wildlife management, honor government commitments, and safeguard the public. Sincerely, SEE LETTER FOR LIST OF 2 PAGES / 2 COLUMNS OF MEMBERS AND SUPPORTERS: Page 2 and 3 of 3